Sycamore 215 Cross Dock
Initial Study
Mitigated Negative Declaration

Prepared for:

City of Riverside
Community Development Department
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Riverside, California 92522

Project Proponent:

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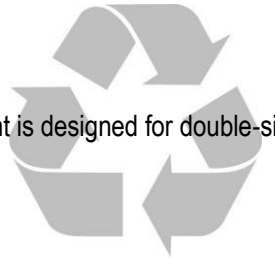
July 2015



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1 Introduction

The City of Riverside (Lead Agency) received applications for a Tentative Parcel Map and Design Review for a 245,170-square foot warehouse building located south of Cottonwood Avenue, between Interstate 215 and Old 215 Frontage Road in the City of Riverside, California. The approval of these applications constitutes a project that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code, Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Section 15000 et. seq.).

This Initial Study has been prepared to assess the short-term, long-term, and cumulative environmental impacts that could result from the proposed project.

This report has been prepared to comply with Section 15063 of the State CEQA Guidelines, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.11);
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4.);
- Discussion of ways to mitigate significant effects identified, if any (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Sections 4.10); and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 5).

1.1 – Purpose of CEQA

The body of state law known as *CEQA* was originally enacted in 1970 and has been amended a number of times since then. The legislative intent of these regulations is established in Section 21000 of the California Public Resources Code, as follows:

The Legislature finds and declares as follows:

a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

The Legislature further finds and declares that it is the policy of the State to:

h) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
i) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
j) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
k) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
l) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
m) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
n) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in Section 21002 of the Public Resources Code, quoted below:

> The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

1.2 – Tiering

This Initial Study *tiers* from the City's General Plan EIR. Section 15152 et seq of the CEQA Guidelines describes *tiering* as a streamlining tool as follows:

(a) *Tiering* refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

(b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

(c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed,

site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

(d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to affects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.

(e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.

(f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

(1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.

(2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see Section 15064(i).

(3) Significant environmental effects have been *adequately addressed* if the lead agency determines that:

(A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

(B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

(g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.

1.3 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study. Such comments should explain any perceived deficiencies in the assessment of impacts, identify the information that is

purportedly lacking in the Initial Study or indicate where the information may be found. All comments on the Initial Study are to be submitted to:

Kyle Smith, Senior Planner
City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522
951-826-5220

Following a 20-day period of circulation and review of the Initial Study, all comments will be considered by the City of Riverside prior to adoption.

1.4 – Availability of Materials

All materials related to the preparation of this Initial Study are available for public review. To request an appointment to review these materials, please contact:

Kyle Smith, Senior Planner
City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522
951-526-5220

2 Project Description

2.1 – Project Title

Sycamore 215 Cross Dock

2.2 – Lead Agency Name and Address

City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522

2.3 – Contact Person and Phone Number

Kyle Smith, Senior Planner
951-826-5220

2.4 – Project Location

South of Cottonwood Avenue between Interstate 215 and Old 215 Frontage Road
Riverside, California 92507

2.5 – Project Sponsor's Name and Address

KB Development
3241 Alta Laguna Boulevard
Laguna Beach, California 92651

2.6 – General Plan Land Use Designation

The project site is designated Business and Business/Office Park (B/OP) in the City of Riverside General Plan and is within the Sycamore Canyon Business Park Specific Plan. These designations provides for single or mixed light industrial uses that do not create nuisances due to odor, dust, noise, or heavy truck traffic. Suitable uses include corporate and general business offices, research and development, light manufacturing, light industrial, and small warehouse uses.

2.7 – Zone

The project site is zoned BMP-SP - Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones. This zone has been established to provide a district for low-intensity and low-impact industrial, office, and related uses. Typical uses include research and development facilities and laboratories, administrative, executive and professional offices, small-scale warehouses, light manufacturing, and support commercial.

2.8 – Project Description

The project includes construction of a 245,170-square foot warehouse building (see Exhibit 2, Site Plan) on 13.4 acres located south of Cottonwood Avenue between Interstate 215 and Old 215 Frontage Road (APNs 263-080-006, -007, -008, -009). The project site is currently vacant. The building is intended to be used as a warehouse/distribution facility; however, end user has not been identified at this time, as such, specific details about the future operation of the facility are not

currently available. The project includes 124,546 square feet of landscaping, 177 standard automobile parking stalls, 6 accessible automobile parking stalls, 67 trailer parking stalls, and 27 loading docks. The project applications include a Tentative Parcel Map and Design Review .

The buildings will be of concrete tilt up panel style construction with architecturally enhanced main entrance and blue window glazing. The building will be coated in dark and light shades of brown (Sherwin Williams SW 7540 Artisan Tan, SW 7537 Irish Cream, SW 7713 Tawny Tan, and SW 7117 Melon Tint). The western side of the building will not contain any windows due to the proximity to the I-215. The eastern boundary will include an eight-foot wall to screen the loading docks and truck activity from Old 215 Frontage Road.

The project will have access to Old 215 Frontage Road via two 40-foot wide on the eastern boundary of the project site. Interior drive aisles along the northern, western, and southern sides of the building will have a minimum width of 30 feet to provide adequate truck and emergency access as required by the Fire Department. The interior drive aisles within passenger vehicle parking areas on the northeastern and southeastern portions of the site will be 26 feet wide and provide access for passenger vehicles only. Existing street improvements include street pavement and roadway striping. There are currently no curbs, gutters, sidewalks, or parkway landscape improvements. The proposed project will include the construction of a new street parkway with public sidewalk and landscaping and curb and gutter.

Construction Scheduling
Construction of the building is anticipated to begin in early 2016 and take approximately 18 months to complete.

Grading and Drainage
The project site is relatively flat and will not require the import or export of soils. Currently, the site slopes slightly to the southwest. Proposed on-site drainage improvements for this project include the creation of a bioswale and landscape area along the western boundary of the project and a detention basin at the northwestern corner of the site. This infiltration system will allow on-site drainage disposal of stormwater (see Exhibit 2).

Landscaping
The proposed landscape coverage for the site is 124,546 square feet. The landscaping will be designed to significantly reduce the required water consumption of the site as compared to traditional landscape designs. The design includes a variety of trees and shrubs that are described in more detail in the Landscape Plan included in the project submittal. Landscaped areas are to be located around the perimeter of the site and along parking areas and the proposed detention basin.

Utilities
The proposed project will connect to existing facilities within existing right-of-ways. Water service is provided by Western Municipal Water District (WMWD) via an existing water line along the western portion of the project site. Sewer service is provided by the Riverside Public Works Department. The proposed project will connect to existing sewer laterals along the eastern portion of the project site. The proposed project will provide on-site stormwater disposal via a bioswale and landscaped area along the western project boundary and a detention basin at the northwestern corner of the project site. New curb and gutter will be provided along Old 215 Frontage Road. Natural gas will be provided by the Southern California Gas Company via a six-inch main along the eastern portion of the site. Electrical services will be provided by Riverside Public Utility. Utility undergrounding will be required.

2.9 – Surrounding Land Uses

Existing development surrounds the project site to the north, east, and south. Interstate 215 is located to the west of the project site. Table 1 (Surrounding Land Uses) lists the existing land use, General Plan Designations, and Zoning districts surrounding the project site.

Table 1
Surrounding Land Uses

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	B/OP - Business/Office Park	BMP-SP - Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones	Vacant
North	B/OP - Business/Office Park	BMP-SP - Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones BMP – Business and Manufacturing Park	Single Family Home
South	B/OP - Business/Office Park	BMP-SP - Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones BMP – Business and Manufacturing Park	Commercial
East*	BP – Business Park/Light Industrial	BP – Business Park	Vacant Auto Repair
West	B/OP - Business/Office Park	BMP-SP - Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones BMP – Business and Manufacturing Park	Interstate 215
** City of Moreno Valley designation.*			

2.10 – Environmental Setting

The project site is currently vacant with and is located within business park area. Interstate 215 is located to the west of the project site. There is currently no paved access to the project site; however, the vacant site can be accessed via Old 215 Frontage Road.

2.11 – Required Approvals

The City of Riverside is the only land use authority for this project and this project will require the following City approvals:

- Tentative Parcel Map
- Design Review

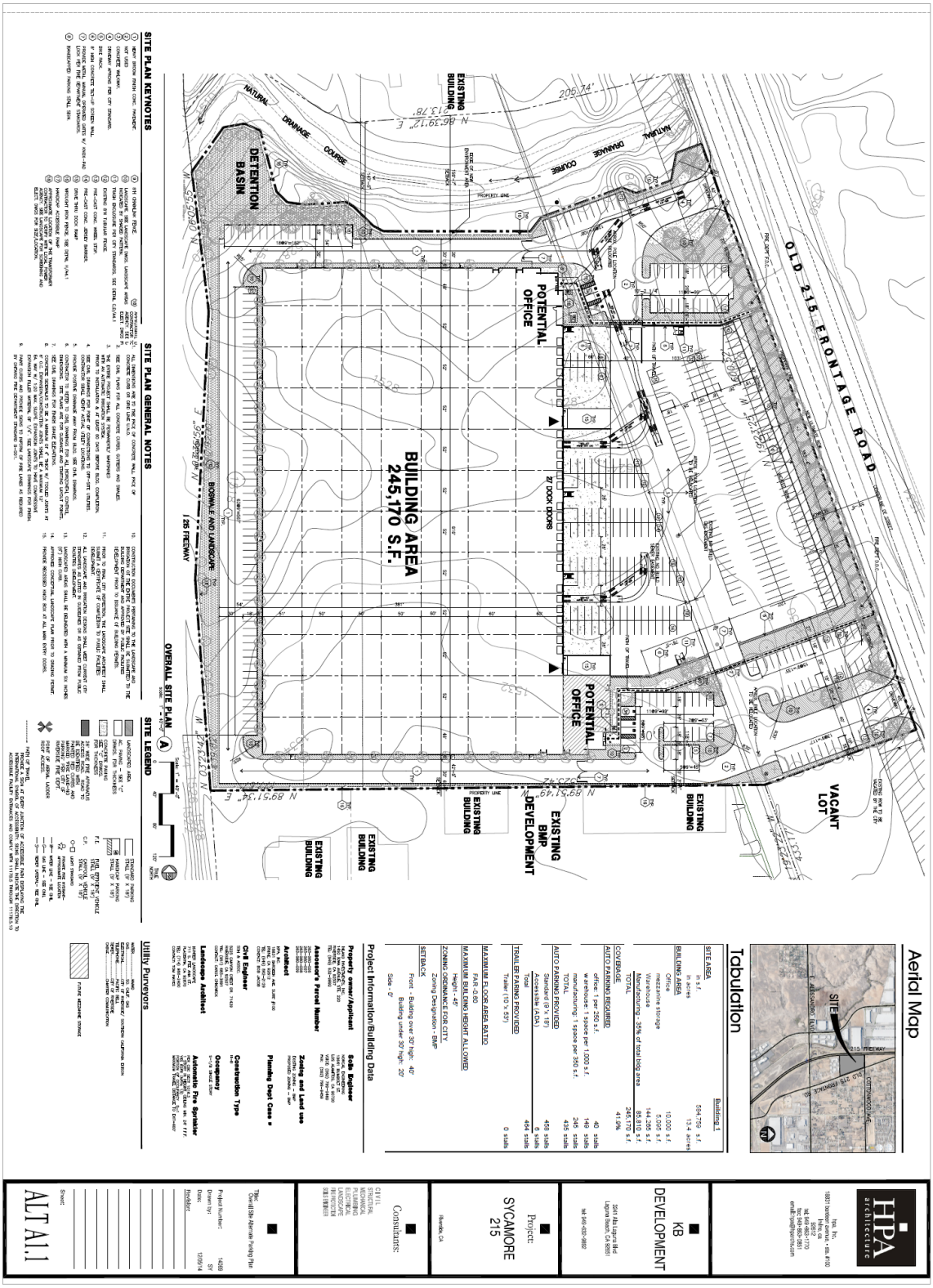
2.12 – Other Public Agencies Whose Approval is Required

None

2.13 – Project Specific Technical Studies

- Air Quality and Climate Change Assessment
- Burrowing Owl Survey
- Jurisdictional Delineation
- Phase I Historical/Archaeological Resources Survey
- Geotechnical Engineering Investigation
- Phase I Environmental Site Assessment
- Soil Infiltration Study
- Acoustical Control Memo

Exhibit 1
Site Plan



3 Determination

3.1 – Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a 'Potentially Significant Impact' as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Geology /Soils
☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials	☐	Hydrology / Water Quality
☐	Land Use / Planning	☐	Mineral Resources	☐	Noise
☐	Population / Housing	☐	Public Services	☐	Recreation
☐	Transportation/Traffic	☐	Utilities / Service Systems	☐	Mandatory Findings of Significance

3.2 – Determination

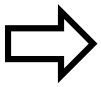
☐	The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☑	The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	The City of Riverside findsthat the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	The City of Riverside finds that the proposed project MAY have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

City of Riverside

Printed Name & Title



4 Evaluation of Environmental Impacts

4.1 – Aesthetics

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☑	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway?	☐	☐	☐	☑
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☑	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☑	☐

a) **Less than Significant Impact.** Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). The project site is currently vacant and surrounded by single family residential to the north, vacant land and automotive repair to the east, office park to the south, and Interstate 215 to the west of the project site. Views of the Box Springs Mountains from the business park to the south of the project site may be blocked; however, the project is proposed within an area designated for business/manufacturing park and the land to the south is developed with business park uses. Riverside Municipal Code Chapter 19.130 requires that all development in the Business Manufacturing Park (BMP) zone have a maximum building height of 45 feet with no special restrictions for development along Special Boulevards. The proposed building will have a maximum height of 41 feet. The project site and vicinity are not designated by the City's General Plan for the preservation or uniqueness of scenic views.[1] Furthermore, the General Plan Environmental Impact Report (EIR) found that impacts to scenic vistas would be less than significant with implementation of General Plan's policies supporting a balance between development interests and broader community preservation objective. This project does not require a general plan amendment and is consistent with the policies of the B/OP land use designation. Considering the project will not directly alter a scenic vista and is consistent with the General Plan EIR analysis, impacts will be less than significant.

b) **No Impact.** The project is not adjacent to a designated state scenic highway as identified on the California Scenic Highway Mapping System.[2] The project site is currently vacant. As discussed in Section 4.5 (Cultural Resources), along the eastern boundary of the project site is a small portion of Site 33-015743, which represents the remains of the former California Southern Railway. As determined by the Historical/Archaeological Resources Survey Report (Appendix E), the removal of all physical features of railroad operations from the railroad grade and the drastic changes that have occurred in

1 City of Riverside. General Plan Environmental Impact Report. November 2007

2 California Department of Transportation. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/scenic_highways/ [June 2015]

the area, the project area no longer retains sufficient historic integrity. The surviving railroad grade does not demonstrate any unique or special qualities in design, engineering, construction, or artistic value; therefore, they do not appear to qualify as a historical resource. The site does not contain rock outcroppings or significant trees, or other features that could qualify as a scenic resource. Considering no scenic resources are located on the project site or will be altered as a result of the project, no impact will occur.

c) **Less than Significant Impact.** Degradation of visual character or quality is defined by substantial changes to the existing site appearance through construction of structures such that they are poorly designed or conflict with the site's existing surroundings. Construction of the proposed building on the currently vacant site would alter the existing visual character of the vacant site. However, the project site is located in an area designated for business and office park use. Old 215 Frontage Road is developed with business park use to the south, single family residential to the north, and vacant land and automobile repair services to the east. To the west of the project site is the I-215. The project will comply with all pertinent design requirements of the Zoning Code, to assure quality site design and building architecture that is well constructed. This includes installation of landscaping, undulating and decorative screening walls and facades, window fenestration, and varying roof design. Development of the proposed project will improve the overall character of the area by introducing a high-quality design. The City of Riverside General Plan EIR states that City-wide design guidelines prevent the use of highly reflective surfaces and metal siding. The building will be of concrete tilt up panel style construction with architecturally enhanced main entrance and blue window glazing. With design features included, the project will have less than significant impacts on the visual character of the site and the surroundings.

d) **Less than Significant Impact.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists).

Development of the proposed project will require installation of outdoor lighting necessary for public safety and maintenance, as well as to accommodate nighttime business operations. All lighting will comply with the development standards contained in the City's Zoning Code. Municipal Code Chapter 19.590 (Performance Standards) requires that on-site lighting be arranged as to reflect away from adjoining property or any public streets. Light shall not be directed skyward or in a manner that interferes with aircraft operation.

The proposed project could involve nighttime activities that would result in additional sources of light in the night. However, the project site is surrounded by single family residential to the north, vacant land and automotive repair to the east, business park use to the south, and Interstate 215 to the west and there is currently substantial nighttime lighting in the surrounding areas of the project site due to surrounding developments and the general urban character of the area. Addition of new sources of permanent light and glare as a result of implementation of the proposed project would not significantly increase ambient lighting in the project vicinity. Moreover, due to the built nature of the project area, there is a significant existing amount of ambient light both in the project area and in the immediately surrounding vicinity. The City of Riverside General Plan EIR states that City-wide design guidelines prevent the use of highly reflective surfaces and metal siding. With adherence to Zoning Code and General Plan guidelines, impacts will be less than significant.

4.2 – Agriculture and Forest Resources

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☑
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☑
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☑
d) Result in loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☑
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☑

a) **No Impact.** As indicated in the California Department of Conservation Division of Land Resource Protection and the City of Riverside General Plan EIR, the project site is identified as *Farmland of Local Importance* and *Other Land*.[3] [4] *Farmland of Local Importance* is defined as having soils that would be classified as prime and statewide but lack available irrigation water, lands producing major crops for Riverside County but that are not listed as unique crops, dairylands, and lands identified by City of County ordinance as agricultural zones or contracts. *Other land* is identified as land that is not included in any other mapping category. Common examples include low density rural developments and vacant nonagricultural land surrounded on all size by urban development.

Because a portion of the site is identified as *Farmland of Local Importance*, the potential significance of the site's conversion of agricultural lands was determined utilizing the California Agricultural Land Evaluation and Site Assessment (LESA) Model. The LESA Model is a point-based approach that is generally used for rating the relative value of agricultural land resources and designed to make determinations of the potential significance of a project's conversion of agricultural lands. The LESA

[3] California Department of Conservation. Division of Land Resource Protection. Farmland Mapping and Monitoring Program. Riverside County Important Farmland 2012, Sheet 1 of 3

[4] Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

Model is composed of six different factors. Two Land Evaluation (LE) factors are based upon measures of soil resources quality. Four Site Assessment (SA) factors provide measures of a given project's size, water resources availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, each of these factors is separately rated on a 100 point scale. The factors are then weighted relative to one another and combined, resulting in a single numeric score for a given project, with a maximum attainable score of 100 points. It is this project score that becomes the basis for making a determination of a project.[5] The final LESA score for the project site is 24.85 (see Appendix A). Based on the LESA Model scoring thresholds, sites with a score of zero to 39 are not considered significant. Therefore, development of the proposed project will not result in the conversion of a valuable agricultural land resource to non agricultural use. No impact will result.

In addition, the project site is not designated or zoned for agricultural use according to the General Plan and Zoning Map. Therefore, the proposed project will not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impact will result.

b) **No Impact.** As indicated by the 2007 Riverside General Plan EIR and the Department of Conservation Division of Land Resource Protection, the project site is not identified as being on Williamson Act enrolled land.[6] [7] In addition the project is currently zoned as Business Manufacturing Park which designates the site for industrial use. Therefore, there will be no conflict with existing zoning for agricultural use or a Williamson Act contract and impacts will be no impacts.

c) **No Impact.** Public Resources Code Section 12220(g) identifies forest land as 'land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.' The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The project site is zoned for industrial uses, with disturbed/ruderal vegetation as well as native and ornamental vegetation onsite; therefore, development of this project will have no impact to any timberland zoning.

d) **No Impact.** The project site is currently vacant. The project site is not being managed or used for forest land and is not zoned for forest land use; thus, there will be no loss of forest land or conversion of forest land to non-forest use as a result of this project.

e) **No Impact.** The project site is currently vacant. The project is surrounded by single family residential to the north, vacant land with no trees and automotive repair use to the east, business park use to the south, and Interstate 215 to the west. None of the surrounding sites contain existing forest uses. Development of this project will not change the existing environment in a manner that will result in the conversion of forest land to a non-forest use.

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5 California Department of Conservation. California Agricultural Land Evaluation and Site Assessment Model Instruction Manual. 1997

6 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

7 California Department of Conservation. Division of Land Resource Protection. Riverside County Williamson Act FY 2008/2009 Sheet 1 of 3. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/ [June 2015]

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☑	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☑	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☑	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☑

a) **Less than Significant Impact.** A significant impact could occur if the proposed project conflicts with or obstructs implementation of the South Coast Air Basin 2012 Air Quality Management Plan (AQMP). Conflicts and obstructions that hinder implementation of the AQMP can delay efforts to meet attainment deadlines for criteria pollutants and maintaining existing compliance with applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, consistency with the South Coast Air Basin 2012 AQMP is affirmed when a project (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation and (2) is consistent with the growth assumptions in the AQMP.[8] A consistency review is presented below:

1. The project would result in short-term construction and long-term pollutant emissions that are less than the CEQA significance emissions thresholds established by the SCAQMD, with mitigation incorporated, as demonstrated in Section 4.3(b) et seq of this report; therefore, the project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation.

2. The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and *significant projects*. *Significant projects* include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste

[8] South Coast Air Quality Management District. CEQA Air Quality Handbook. 1993

disposal sites, and off-shore drilling facilities; therefore, the proposed project is not defined as *significant*. This project does not include a General Plan Amendment and therefore does not required consistency analysis with the AQMP.

Based on the consistency analysis presented above, the proposed project will not conflict with the AQMP.

b) **Less than Significant Impact with Mitigation Incorporation.** A project may have a significant impact if project related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to existing or project air quality violations. The proposed project is located within the South Coast Air Basin, where efforts to attain state and federal air quality standards are governed by the SCAQMD. Both the State of California (State) and the Federal government have established health-based ambient air quality standards (AAQS) for seven air pollutants (known as 'criteria pollutants'). These pollutants include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), inhalable particulate matter with a diameter of 10 microns or less (PM_{10}), fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and lead (Pb). The state has also established AAQS for additional pollutants. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. Where the state and federal standards differ, California AAQS are more stringent than the national AAQS.

Air pollution levels are measured at monitoring stations located throughout the air basin. Areas that are in nonattainment with respect to federal or state AAQS are required to prepare plans and implement measures that will bring the region into attainment. Table 2 (South Coast Air Basin Attainment Status) summarizes the attainment status in the Basin for the criteria pollutants. Discussion of potential impacts related to short-term construction impacts and long-term area source and operational impacts are presented below.

Table 2
South Coast Air Basin Attainment Status

Pollutant	Federal	State
O_3 (1-hr)	--	Nonattainment
O_3 (8-hr)	Nonattainment	Nonattainment
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Unclassified/Attainment	Attainment
NO_2	Unclassified/Attainment	Attainment
SO_2	Attainment	Attainment
Pb	Nonattainment	Attainment
VRP	--	Unclassified
SO_4	--	Attainment
H_2S	--	Unclassified
Sources: ARB 2013		

Construction Emissions

Short-term criteria pollutant emissions will occur during demolition, site grading, building construction, paving, and architectural coating activities. Emissions will occur from use of equipment, worker, vendor, and hauling trips, and disturbance of onsite soils (fugitive dust). To determine if construction of the proposed project could result in a significant air quality impact, the California Emissions Estimator Model (CalEEMod) has been utilized. CalEEMod defaults have generally been used as construction inputs into the model (see Appendix A). The methodology for calculating emissions is included in the CalEEMod *User Guide,* freely available at http://www.caleemod.com.

Construction of the building is anticipated to start in early 2016. In general, CalEEMod defaults for construction schedule phase duration and equipment needs were utilized. Based on the results of the model, maximum daily emissions from the construction of the warehouse will result in excessive emissions of volatile organic chemicals (identified as reactive organic gases) associated with interior and exterior coating activities. To compensate for excessive VOC emissions from coating activities, the model includes use of a minimum 50 grams per liter (g/l) VOC content for interior and exterior coatings. Use of low-VOC coatings during construction activities will reduce VOC emissions to 56.15 lbs/day, less than the threshold established by SCAQMD. The requirement for use of low-VOC coatings has been included as Mitigation Measure AQ-1 in Section 8 of this report. The results of the CalEEMod outputs with mitigation incorporated are summarized in Table 3 (Daily Construction Emissions).

Table 3
Daily Construction Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
2016	6.56	74.92	50.43	0.08	21.21	12.69
2017	56.15	34.98	41.15	0.08	5.2	2.69
Winter						
2016	6.56	74.93	50.33	0.08	21.21	12.69
2017	56.15	35.27	41.86	0.08	5.22	2.69
Threshold	75	100	550	150	150	55
Substantial?	No	No	No	No	No	No

Mitigation Measure

AQ-1 Prior to issuance of building permits, the project proponent shall submit, to the satisfaction of the Planning Department, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the CRP. The CRP measures shall be implemented to the satisfaction of City Building Director. These may include the following:

- That volatile organic compounds (VOC) of proposed architectural coatings not exceed 50 g/l for interior applications.
- That volatile organic compounds (VOC) of proposed architectural coatings not exceed 50 g/l for exterior applications.

This measure shall conform to the performance standard that emissions of volatile organic compounds from application of interior or exterior coatings shall not exceed the daily emissions thresholds established by the South Coast Air Quality Management District. The CRP shall specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings.

Operational Emissions

Long-term criteria air pollutant emissions will result from the operation of the proposed warehouse. Long-term emissions are categorized as area source emissions, energy demand emissions, and operational emissions. Operational emissions will result from automobile, truck, and other vehicle sources associated with daily trips to and from the warehouse. Area source emissions are the combination of many small emission sources that include use of outdoor landscape maintenance equipment, use of consumer products such as cleaning products, and periodic repainting of the proposed warehouse. Energy demand emissions result from use of electricity and natural gas. Emissions from area sources were estimated using CalEEMod defaults.

The California Emissions Estimator Model (CalEEMod) was utilized to estimate mobile source emissions. Trip generation (1.68 daily trips per 1,000 SF) is based on the trip generation rates provided in the Institute of Transportation Engineers *Trip Generation Manual* (9th Edition).[9] Based on SCAQMD recommendations, an average rate of 0.64 trucks per 1,000 square feet has been applied for purposes of this analysis.[10] Passenger vehicles will consist of 61.80 percent of the fleet mix, light-duty trucks will consist of 6.46 percent of the fleet mix, medium-heavy duty trucks will consist of 8.70 percent of the truck trips, and heavy-heavy duty truck trips consist of 23.04 percent of the fleet mix. Trip lengths have been adjusted based on a study of metropolitan commercial and freight travel conducted by the National Cooperative Highway Research Program. According to observed data collected in the field for the Southern California Association of Governments (SCAG) region, trip lengths for warehouse uses are estimated at 5.92 miles for light-duty trucks, 13.06 for medium-duty trucks, and 22.40 for heavy-duty trucks. Total vehicle miles were calculated using the average daily trips for each vehicle class and divided by total daily truck trips to get to an average truck distance of 17.41 miles. Assuming an opening year of 2018, the results of the CalEEMod model for summer and winter operation of the project are summarized in Table 4 (Operational Daily Emissions). Based on the results of the model, operational emissions associated with operation the project will not exceed the thresholds established by SCAQMD.

Table 4
Operational Daily Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Area Sources	14	<1	<1	0	<1	<1
Energy Demand	<1	<1	<1	<1	<1	<1
Mobile Sources	2	23	28	<1	5	2
Summer Total	*16*	*23*	*28*	*<1*	*5*	*2*
Winter						
Area Sources	14	<1	<1	0	<1	<1
Energy Demand	<1	<1	<1	<1	<1	<1
Mobile Sources	2	23	30	<1	5	2
Winter Total	*16*	*24*	*31*	*<1*	*6*	*2*
Threshold	55	55	550	150	150	55
Substantial?	No	No	No	No	No	No

c) **Less than Significant Impact with Mitigation Incorporation.** Cumulative short-term, construction-related emissions from the project will not contribute considerably to any potential cumulative air quality impact because short-term project emissions will be less than significant and other concurrent construction projects in the region will be required to implement standard air quality regulations and mitigation pursuant to State CEQA requirements, just as this project has.

The SCAQMD CEQA Air Quality Handbook identifies methodologies for analyzing long-term cumulative air quality impacts for criteria pollutants for which the Basin is nonattainment. These methodologies identify three performance standards that can be used to determine if long-term emissions will result in cumulative impacts. Essentially, these methodologies assess growth associated with a land use project and are evaluated for consistency with regional projections. These methodologies are outdated, and are no longer recommended by SCAQMD. SCAQMD allows a project to be analyzed using the projection method such that consistency with the AQMP will indicate that a project will not contribute considerably to cumulative air quality impacts. As discussed in AQMP Consistency, the proposed project is consistent with growth assumptions in the AQMP, and would not exceed any applicable SCAQMD thresholds for short- and long-term emissions. Therefore, the proposed project will not contribute to any potential cumulative air quality impacts.

9 Institute of Transportation Engineers. Trip Generation Manual. 9th ed. September 2012
10 Southcoast Air Quality Management District. *Warehouse Truck Trip Study Data Results and Usage.* July 25, 2014

d) **Less than Significant Impact.** Sensitive receptors are those segments of the population that are most susceptible to poor air quality such as children, the elderly, the sick, and athletes who perform outdoors. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Localized Significance Thresholds

As part of SCAQMD's environmental justice program, attention has recently been focusing more on the localized effects of air quality. Although the region may be in attainment for a particular criteria pollutant, localized emissions from construction activities coupled with ambient pollutant levels can cause localized increases in criteria pollutant that exceed national and/or State air quality standards.

Construction-related criteria pollutant emissions and potentially significant localized impacts were evaluated pursuant to the SCAQMD Final Localized Significance Thresholds Methodology. This methodology provides screening tables for one through five acre project scenarios, depending on the amount of site disturbance during a day using the Fact Sheet for equipment usage in CalEEMod.[11] Daily oxides of nitrogen (NO_X), carbon monoxide (CO), and particulate matter (PM_{10} and $PM_{2.5}$) emissions will occur during construction of the project, grading of the project site, and paving of facility parking lots and drive aisles. Table 5 (Localized Significance Threshold Analysis) summarize on- and off-site emissions as compared to the local thresholds established for Source Receptor Area (SRA) 24 (Perris Valley). Based on the use of one grader, one dozer, two scrapers, and two tractors during grading activities, a 3-acre threshold will be used (using linear regression). A 50 meter receptor distance was used to reflect the proximity of residential uses across Old 215 Frontage Road to the east of the project site. Note that particulate matter emissions account for daily watering required by SCAQMD Rule 403 (three times per day for a 55 percent reduction in fugitive dust). Emissions from construction activities will not exceed any localized threshold.

Table 5
Localized Significance Threshold Analysis (lbs/day)

Phase	CO	NO_X	PM^{10}	$PM^{2.5}$
Site Preparation	41	55	11	7
Grading	49	75	7	5
Building Construction	19	29	2	2
Paving	15	20	1	1
Architectural Coating	2	2	<1	<1
Threshold	**1,549**	**229**	**24**	**7**
Potentially Substantial?	**No**	**No**	**No**	**No**

Operation-related LSTs become of concern when there are substantial on-site stationary sources that could impact surrounding receptors. The proposed project does not include such on-site operations; therefore, impacts related to operational LSTs will not occur.

Carbon Monoxide Hot Spots

A carbon monoxide (CO) hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hotspots have the potential to violate State and Federal CO standards at intersections, even if the broader Basin is in attainment for Federal and State levels. The California Department of Transportation Project-Level Carbon Monoxide Protocol (Protocol) screening procedures have been utilized to determine if the proposed project could potentially result in a CO hotspot. Based on the recommendations of the Protocol, a screening analysis should be performed for the proposed project to determine if a detailed analysis will be required. The California Department of Transportation notes that because of the age of the assumptions used in the screening procedures and the obsolete nature of the modeling tools utilized to develop the screening procedures in the Protocol, they are no longer accepted. More recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District (SMAQMD) developed a screening threshold in 2011 which states that any

[11] South Coast Air Quality Management District. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds.

project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010 which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. The proposed project's operations would not involve an intersection experiencing this level of traffic; therefore, the proposed project passes the screening analysis and impacts are deemed less than significant. Based on the local analysis procedures, the proposed project would not result in a CO hotspot.

e) **No Impact.** According to the CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed warehouse is sited within an existing industrial and commercial area. The proposed warehouse does not produce odors that would affect a substantial number of people considering that the proposed warehouse will not result in heavy manufacturing activities. No impact will occur.

4.4 – Biological Resources

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☑	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☑	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☑	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☑	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☑
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☑	☐

a) **Less than Significant Impact.** The project site is currently vacant and is not located within any area designated as Critical Habitat by the United States Fish and Wildlife Service (USFWS).[12] According to the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) database, 11 species have been recorded within a one-mile radius of the proposed project site as summarized in Table 6 (Species Occurrences within One Mile of Project Site).

Table 6
Species Occurrences within One Mile of Project Site

Common Name (*Scientific Name)*	Federal Status	State Status	State Rank	Rare Plant Rank	Last Observed
Stephens' kangaroo rat (Dipodomys stephensi)	Endangered	Threatened	S2	--	2004
Stephens' kangaroo rat (Dipodomys stephensi)	Endangered	Threatened	S2	--	1998
least Bell's vireo (*Vireo bellii pusillus)*	Endangered	Endangered	S2	--	2011
least Bell's vireo (*Vireo bellii pusillus)*	Endangered	Endangered	S2	--	2010
red-diamond rattlesnake (*Crotalus ruber)*	None	None	S2	--	1947
western spadefoot (*Spea hammondii)*	None	None	S3	--	1993
western spadefoot (*Spea hammondii)*	None	None	S3	--	1978
southern grasshopper mouse (*Onychomys torridus ramona)*	None	None	S3	--	1908
loggerhead shrike (*Lanius ludovicianus)*	None	None	S4	--	1994
northwestern San Diego pocket mouse (*Chaetodipus fallax fallax)*	None	None	S3 S4	--	1992
smooth tarplant (*Centromadia pungens ssp. laevis)*	None	None	S2	1B.1	1995

State Rank:
S2 – Imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or state.
S3 – Vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation.
S4 – Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors.

Rare Plant Rank
1B.1 – Plants rare, threatened or endangered in California and elsewhere; seriously threatened in California

Source: CDFW CNDDB Database. 2015

Of the 11 occurrences identified within one mile of the project site, two species were observed on the project site: Stephens' kangaroo rat (*Dipodomys stephensi*) and western spadefoot (*Spea hammondii*). Stephens' kangaroo rat has a federal status of *Endangered* and a state status of *Threatened*. According to the Rarefind Occurrence Report, the Stephens' kangaroo rat

[12] U.S. Fish and Wildlife Service. Critical Habitat Portal. http://ecos.fws.gov/crithab/ [July 2015]

was last surveyed and last observed in 1998 to the west of the project site within the Sycamore Canyon Wilderness Park, the area west of the project site, and on the western boundary of the project site. The Stephens' kangaroo rat has a State ranking of S2, identifying the species as imperiled because of rarity due to very restricted range, very few populations, steep declines, or other factors. Western spadefoot was last surveyed and observed in 1978 to the south and within the southern portion of the project site and does not have state or federal statuses. However, it was assigned a ranking of S3, which identifies it as vulnerable in the state due to a restricted range, relatively few populations, recent and widespread declines, or other factors making it vulnerable to extirpation.

The City of Riverside indicated that, according to the Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP), the project site is within a burrowing owl survey area and burrowing owls may be present on site. A burrowing owl survey was conducted for the project site between July 25, 2014 and July 29, 2014 (Appendix C). During the survey, only common wildlife species were observed on the site. The survey also revealed that the project site is dominated by a monoculture of non-native Russian thistle. Neither burrowing owls nor burrowing owl burrows were observed during the survey. Due to the absence of suitable burrow habitat, burrowing owl has a low potential to occur on the project site. Therefore, impacts will be less than significant.

b) **Less than Significant Impact.** The jurisdictional delineation prepared for the proposed project (Appendix D) identified five vegetation communities, characterized as *Salix* Alliance, Mulefat Alliance, *Washingtonia robusta* Alliance, streambed/open water/channel and freshwater marsh. *Salix* Alliance and Mulefat Alliance are classified as riparian communities. The entire site has been subject to anthropogenic disturbances.

Salix Alliance is a riparian community and is composed of arroyo willow and Goodding's willow. It is found in braided, depositional channels of intermittent streams, usually with cobbly or boulder substrate. These drainages rely on rainfall, rather than snowmelt, for their water supply, so they usually have flowing water only for brief periods after winter storms. *Salix* Alliance is found along the northern portion of the project site; however, the proposed project will not result in the removal of this vegetative community. The project could have indirect impacts (e.g., inadvertent damage by construction equipment or decreased water/habitat quality due to runoff). However, with implementation of Best Management Practices, these impacts would be reduced to less than significant.

Mulefat Alliance is an herbaceous riparian scrub strongly dominated by mulefat. This early serial community is maintained by frequent flooding. Found in intermittent stream channels with fairly coarse substrate and moderate depth to the water table. The community found on site is very limited and exists only in small areas of the channel. The proposed project will result in the removal of the limited Mulefat Alliance located at the western boundary of the site; however, because bioswale vegetation will be incorporated along the entire western boundary of the site and the occurrence of Mulefat Alliance on site is limited, impacts will be less than significant.

c) **Less than Significant Impact.** A jurisdictional delineation was prepared for the proposed project in December 2014 (Appendix D). The Sycamore Canyon Creek tributary is located to the north of the project site and specific criteria for wetlands and waters of the U.S. are met for this site. The area is under the jurisdiction of the California Department of Fish and Wildlife, U.S. Army Corps of Engineers and California Regional Water Quality Control Board. Permits/Agreements for activities within the streambed will be required by the California Department of Fish and Wildlife, U.S. Army Corps of Engineers, and California Regional Water Quality Control Board. Final authority over the area rests with the appropriate agencies.

The area to be disturbed will be located immediately south of the Sycamore Canyon Creek tributary. According to the jurisdictional delineation, none of the 0.011 acres of on-site federal jurisdictional areas will be impacted and none of the 0.317 on-site acres of CDFW jurisdictional areas will be impacted by the proposed project. According to MSHCP riparian/riverine jurisdictional delineation, 0.082 acres of Mulefat Alliance is located on the western boundary of the project site. This limited community will be removed; however, because bioswale vegetation will be incorporated along the entire western boundary of the site and the occurrence of Mulefat Alliance on site is limited, impacts will be less than significant.

The project could have indirect impacts (e.g., inadvertent damage by construction equipment or decreased water/habitat quality due to runoff) to jurisdictional waters to the north of the project site. However, with implementation of Best Management Practices, these impacts would be reduced to less than significant.

d) **Less than Significant Impact.** The project site is primarily urban and is not located within an established wildlife movement corridor. Additional, the project is not in a known wildlife nursery site. Thus, impacts to wildlife species, migratory corridors and native wildlife nursery sites will not be impacted due to project implementation and impacts will remain less than significant.

e) **No Impact.** The City of Riverside General Plan contains an Open Space and Conservation Element. The following objectives and policies pertain to the protection of biological resources.

Objective OS-5 Protect biotic communities and critical habitats for endangered species throughout the General Plan Area.

Policy OS-5.2 Continue to participate in the MSHCP Program and ensure all projects comply with applicable requirements.

The City of Riverside Municipal Code Section 15.08.020 prohibits the removal of trees or shrubs planted or growing in the public streets except pursuant to the policy established by the Park and Recreation Commission. The project site does not have any trees or shrubs growing in the street; therefore, no street trees or shrubs will be removed. Project implementation will not conflict with any local policies or ordinances pertaining to biological resources.

f) **Less than Significant Impact.** The project site is located within the Western Riverside County MSHCP. The City of Riverside, as the lead agency for the project, requires that the project comply with the Western Riverside County MSHCP. The MSHCP includes a program for the collection of development mitigation fees, policies for the review of projects in areas where habitat must be conserved and policies for the protection of riparian areas, vernal pools, and narrow endemic plants. It also includes requirements to perform plant, bird, reptile, and mammal surveys in certain areas. The primary intent of the MSHCP is to provide for the conservation of a range of plants and animals and in return, provide take coverage and mitigation for projects throughout Western Riverside County to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. It would allow the incidental take (for development purposes) of species and their habitat from development.

The MSHCP identifies that the project area is located in a burrowing owl survey area. Therefore, as required, a burrowing owl survey was conducted to ensure that no burrowing owl have potential to occur on the project site. The burrowing owl survey conducted between July 25, 2014 and July 29, 2014 revealed that no suitable burrowing owl habitat exists on the project site. The project will comply with measures identified in the MSHCP and will not conflict with the MSCHP. Impacts will be less than significant with implementation of standard MSHCP measures.

4.5 – Cultural Resources

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?	☐	☐	☑	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	☐	☑	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☑	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☑	☐

a) **Less than Significant Impact.** A Phase I Historical/Archaeological Resources Survey Report (Appendix E) was prepared by CRM Tech in May 2015 in which the cultural setting of the area is provided. In addition, historical research and a field survey was conducted.

Records Search

On April 14, 2015, CRM Tech completed the records search at the Eastern Information Center (EIC), University of California, Riverside. During the records search, maps and records for previously identified cultural resources and existing cultural resources reports within a one-mile radius of the project site were examined. The records search at the EIC yielded one previous study pertaining to the project area. That study, a reconnaissance-level survey completed in 1982, covered a total of 1,430 acres but only entailed the field inspection of "arbitrarily defined sections of the Study Area" using a transect system at 20- to 40-meter intervals. Therefore, the current project area evidently had not been surveyed during the past 33 years, and never at an intensive level according to current professional standards.

The records search results further indicate that linear archaeological site, 33-015743, was previously delineated as lying partially on the eastern edge of the project site. The site was originally recorded in 2005 as the Atchison, Topeka and Santa Fe (ATSF) Railway's San Jacinto Valley line between Perris and San Jacinto, which was built in 1888. In 2009, the site was expanded to include the ATSF mainline from Perris to the Riverside-San Bernardino County line at Highgrove, which ran through the project vicinity.

Historical Research

Historical sources indicate that the earliest man-made feature to be observed in the project vicinity was a "Wagon Road to Timicula," which ran a generally northwest-southeast course about a half-mile east of the project site in the 1850s. In the 1890s, this wagon road had been joined by a web of crisscrossing roads in the project vicinity, including one that traversed the project area itself, but the surrounding area still remained largely unsettled. By then, the railroad line that has been designated Site 33-015743 had become the most notable man-made feature in and near the project area.

The railroad was once a part of the ATSF mainline between San Bernardino and San Diego, which was constructed in 1882-1883 under the name of the California Southern Railway, a joint effort between the ATSF and prominent citizens of San Diego. Two years later, the California Southern Railway was extended to Waterman (present-day Barstow) and connected with the ATSF's transcontinental railroad system, spelling the end of the Southern Pacific Railway's notorious monopoly on modern transportation in California.

Due to repeated flood damage, the tracks between Temecula and Fallbrook were abandoned by the ATSF after the completion of the coastal route between Los Angeles and San Diego in 1888. After that, the segment of the former California Southern Railway mainline between Riverside and Temecula became essentially a spur line serving the agricultural regions of Perris, San Jacinto, and Temecula Valleys. As railroad traffic dwindled in general, the ATSF removed the tracks between Lake Elsinore and Temecula in 1935.

Today, the terminus of this line is at the Orange Empire Railway Museum in Perris, with a branch line extending to San Jacinto from Perris. The line remained in service at least into the 1960s but was no longer operational by 1978. It was subsequently realigned to a new course further to the west and outside the project site, along the western side of the current I-215 right-of-way, presumably around the time when the interstate freeway was completed through this area in the early 1990s. The original railroad alignment across the project site has lain abandoned ever since.

Other than the rail line and the adjacent U.S. Highway 395 (now the Old 215 Frontage Road), no man-made features were present within or adjacent to the project area in the 1930s despite the noticeable growth nearby. By 1948-1953, however, a group of buildings had appeared in the northeastern portion of the project site. Most of these buildings were subsequently removed, leaving a lone survivor on the property during the 1960s-1970s. The project site was entirely vacant in the mid-1990s, but hosted what appears to have been a nursery operation in 2001-2006. By 2007, all buildings and related features in the project site had been demolished, and the property has remained vacant since then.

Field Survey

During the field survey, the abandoned railroad grade from the dismantled ATSF line, representing a small portion of Site 33-015743, was found running northwest-southeast just inside the eastern boundary of the project site. At this location, all physical components of the railroad operation, including rails and ties, have been removed, leaving only the disturbed railroad grade vaguely recognizable.

No other features or artifact deposits of historical or prehistoric origin were encountered during the survey. As the historical research results indicate, all of the buildings and associated features that were once located in the project site have been removed, and the only remnants they have left are broken pieces of concrete and asphalt scattered throughout the property. Scattered refuse was also observed across the project site, some of it presumably from the nursery operation in 2001-2006, but all of the items examined are modern in age, and none of them is of any historical/archaeological interest.

Site Evaluation

At the project location, Site 33-015743 represents the remains of the former California Southern Railway. Completed under the influence of the ATSF in 1882-1883, the California Southern Railway marked the beginning of the end of the Southern Pacific Railway's monopoly on modern transportation in California. The successful introduction of a second transcontinental railroad system by the ATSF was directly responsible for the southern California land boom of the 1880s and helped reshape the political, social, and cultural life in the state. As such, Site 33-015743 is arguably closely associated with an event that had a momentous impact on late 19th century California history.

However, with removal of all physical features of railroad operations from the railroad grade and the drastic changes that have occurred in the surrounding cultural landscape, the portion of Site 33-015743 in the project site no longer retains sufficient historic integrity in the aspects of design, setting, materials, workmanship, feeling, and association to relate to its period of significance, namely the late 19th century. The surviving railroad grade does not demonstrate any unique or special qualities in design, engineering, construction, or artistic value, nor does it hold the potential for any important archaeological data.

Based on these considerations, the portion of Site 33-015743 in the project site does not appear eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, nor for local designation by the City of Riverside. Therefore, it does not qualify as a "historical resource". Impacts will be less than significant.

b) **Less than Significant Impact with Mitigation Incorporation.** The project site will not involve import or export of soil. According to the Riverside General Plan EIR, the project site is located in an area with low archaeological sensitivity. CRM Tech conducted a records search and consulted with Native American groups as part of the Phase I Historical/Archaeological Resources Survey.

In response to CRM Tech's inquiry, the Native American Heritage Commission (NAHC) reported in a letter dated May 5, 2015, that the sacred lands record search identified no Native American cultural resources within the project site, but recommended that local Native American groups be contacted for further information. For that purpose, the commission provided a list of potential contacts in the region.

Upon receiving the NAHC's response, CRM Tech sent written requests for comments to all 26 individuals on the referral list and the organizations they represent. In addition, as recommended by these tribal representatives or appropriate tribal government staff, the following individuals were also contacted:

- Rob Roy, Environmental Director, La Jolla Band of Luiseno Indians;
- Raymond Huaute, Cultural Resource Specialist, Morongo Band of Mission Indians;
- Jim McPherson, Manager, Culture Resources Department of the Rincon Band of Luiseno Indians.

As of this time, three of the tribal representatives contacted have provided written responses. Raymond Huaute of the Morongo Band of Mission Indians replied by e-mail on May 13, 2015, and requested copies of the record search and maps before making any recommendation or comments regarding the proposed project. The requested information was delivered to Mr. Huaute on May 14, 2015. In a subsequent letter dated May 21, 2015, Mr. Huaute identified the project location as a part of the tribe's traditional use area, and requested a copy of this report for tribal review as well as Native American monitoring during the project.

Daniel McCarthy, Director of Cultural Resources for the San Manuel Band of Mission Indians, stated in an e-mail dated May 8, 2015, that the project location was outside the tribe's traditional use area. The tribe had no specific information on cultural resources in the project vicinity but wished to be notified if any Native American cultural resources were discovered during the project. In addition, Mr. McCarthy also requested a copy of this report for tribal review. Chris Devers, Cultural Clerk for the Pauma Band of Luiseno Indians, responded by e-mail on May 19, 2015 stating that the tribe was unaware of any specific cultural resource in the project area.

In the event that archaeological materials are uncovered, Mitigation Measure C-1 is incorporated to ensure that uncovered resources are evaluated, left in place if possible, or curated as recommended by a qualified archaeologist. Impacts to archaeological resources will be less than significant with mitigation incorporation.

Mitigation Measure

C-1 If potential archaeological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find and to retain a professional archaeologist to examine the materials to determine whether it is a *unique archaeological resource* as defined in Section 21083.2(g) of the State CEQA Statutes. If this determination is positive, the resource shall be left in place, if determined feasible by the project archaeologist. Otherwise, the scientifically consequential information shall be fully recovered by the archaeologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the City Community Development Director. A tribal monitor shall be retained to oversee earthmoving activities and

assist in the identification of potential archaeological resources. The applicant shall bear the cost of implementing this mitigation.

c) **Less than Significant Impact with Mitigation Incorporation.** The project site will not involve import or export of soil. According to the Riverside General Plan EIR, the project site is located in an area with medium prehistoric cultural resource sensitivity. General Plan Policy HP-1.3 states that the City shall protect sites of archaeological and paleontological significance and ensure compliance with the Federal Native American Graves Protection and Repatriation Act in its planning and project review process. In the event that paleontological materials are uncovered, Mitigation Measure C-2 is incorporated to ensure that uncovered resources are evaluated, left in place if possible, or curated as recommended by a qualified anthropologist. Impacts to paleontological resources will be less than significant with mitigation incorporation.

Mitigation Measure

C-2 If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Director of Community Development. The applicant shall bear the cost of implementing this mitigation.

d) **Less than Significant Impact.** There are no known cemeteries on the project site or within the project area. Therefore, no human remains or cemeteries are anticipated to be disturbed by the proposed project. Grading activities for the proposed development will be limited in scale so as to minimally disturb the existing grade. In the unlikely event that human remains are uncovered, the project would comply with CEQA requirements, including halting construction activities until a County coroner can evaluate the find and notify a Native American Representative if the remains are of Native American origin. Compliance with these regulations will result in less than significant impacts.

4.6 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☑
ii) Strong seismic ground shaking?	☐	☐	☑	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☑	☐
iv) Landslides?	☐	☐	☐	☑
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☑	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☑	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	☐	☐	☑	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☑

a.i) **No Impact.** According to the Riverside General Plan EIR, the proposed project is not within an Alquist Priolo fault zone. No impact will occur.

a.ii) **Less than Significant Impact.** The proposed project will be subject to ground shaking impacts should a major earthquake occur in the future. Potential impacts include injury or loss of life and property damage.

The proposed project is subject to the seismic design criteria of the California Building Code (CBC). Adherence to these requirements will reduce the potential of the buildings from collapse during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements will minimize damage to property within the structure because the structure is designed not to collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Adherence to existing regulations will reduce the risk of loss, injury, and death; impacts due to strong ground shaking will be less than significant.

a.iii) **Less than Significant Impact.** The Riverside General Plan EIR indicates that the project is located within an area with low liquefaction potential.[13] In addition, the geotechnical report determined that potential for liquefaction at the project site is considered to be very low based upon the shallow bedrock and density of the subsurface soils (see Appendix F, Geotechnical Engineering Investigation).[14] The proposed project would be subject to standard CBC measures to provide for sound structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. Therefore, based on the determination of the geotechnical report that on-site conditions are not susceptible to liquefaction and with adherence to CBC requirements, project impacts will be less than significant.

a.iv) **No Impact.** Structures built below or on slopes subject to failure or landslides may expose people and structures to harm. The project site is relatively flat and is located within an area with zero to ten percent slopes according to the Riverside General Plan EIR. No impact will result.

b) **Less than Significant Impact.** Erosion and loss of topsoil could result in damage to on-site structures and landscaping or to neighboring properties. Erosion can also impact downstream water bodies while loss of nutrient-rich topsoil impacts the ability for vegetation to grow. The proposed project is subject to SCAQMD Rule 403 and the erosion control requirements of the CBC to prevent wind-blown and stormwater-related erosion. Rule 403 will minimize wind-blown erosion by requiring stabilization of disturbed soils during construction activities through measures such as daily watering. All individual construction project activities greater than one acre will be subject to the State's General Permit for Construction Activities that is administered by the California Regional Water Quality Control Board (RWQCB). Employment of Best Management Practices (BMPs) implemented through a Storm Water Pollution Prevention Plan (SWPPP) would be required to limit the extent of eroded materials from a construction site. Development that is one acre or more would be required to comply with the provisions of the NPDES regulations concerning the discharge of eroded materials and pollutants from construction sites and prepare and implement a SWPPP. With implementation of existing regulations, impacts due to erosion and loss of topsoil will be less than significant.

c) **Less than Significant Impact.** As stated in the Section 4.a.iii), the soils on the project site contain low potential for liquefaction. Based on the project site's slope conditions being relatively flat, potential for lateral spreading and landslide would be minimal. The geotechnical report prepared for the project site determined that potential for excessive settlement will be acceptable by following the recommendations and guidelines set forth in the report. The potential for hydro-consolidation and the susceptibility for ground settlements are considered very low with the proposed stormwater infiltration system. According to the Riverside General Plan EIR, the project site is not located in an area with high shrink-swell potential. Standard CBC and recommendations from the Geotechnical Engineering Investigation (Municipal Code Section 18.090.050) will be implemented during grading. Standard CBC requirements for construction will be implemented. Impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse will be less than significant with adherence to CBC requirements and implementation of the proposed recommendations included in the geotechnical report.

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13 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

14 Norcal Engineering. *Geotechnical Engineering Investigation, Proposed Industrial Warehouse Development West of Old 215 Frontage Road, South of Cottonwood Avenue Riverside, California.* August 14, 2014.

d) **Less than Significant Impact.** Expansive soils shrink and swell in response to moisture due to high percentages of clay. Expansive soils can result in damage to structures when clay within the soil swells due to moisture. According to the Geotechnical Engineering Investigation, the project site is located on soils with very low to low expansion potential containing clayey sand with an expansion index of 27 and silty sand with an expansion index of three. The project site is not located on soil with high shrink-swell potential according to the Riverside General Plan EIR.[15] With adherence to the recommendations of the geotechnical investigation and CBC guidelines, impacts will be less than significant.

e) **No Impact.** The project site is served by a fully functional sewer system. The project will connect to this system and will not require use of septic tanks. No impact will occur.

[15] Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

4.7 – Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☑	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☑	☐

a) **Less than Significant Impact.** Climate change is the distinct change in measures of climate for a long period of time.[16] Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth's orbit around the Sun or direct changes within the climate system itself (i.e. changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet's surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices.

Greenhouse gases differ from other emissions in that they contribute to the "greenhouse effect." The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

A numerical threshold for determining the significance of greenhouse gas emissions in the South Coast Air Basin (Basin) has not been established by the South Coast Air Quality Management District (SCAQMD). As an interim threshold based on guidance provided in the CAPCOA *CEQA and Climate Change* handbook, a non-zero threshold approach based on Approach 2 of the handbook has been used. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 10,000 metric tons carbon dioxide equivalent (MTCO2E) per year for

[16] United States Environmental Protection Agency. Frequently Asked Questions About Global Warming and Climate Change. Back to Basics. April 2009.

industrial projects.[17] This threshold is based on the review of 711 CEQA projects. This threshold will be utilized herein to determine if emissions of greenhouse gases from this project will be significant.

The proposed project will include activities that emit greenhouse gas emissions over the short- and long-term. While one project could not be said to cause global climate change, individual projects contribute cumulatively to greenhouse gas emissions that result in climate change. A greenhouse gas emissions inventory was prepared for the project using under BAU conditions and is analyzed below.

Short-Term Emissions

The project will result in short-term greenhouse gas emissions from construction and installation activities associated with construction of the proposed warehouses. Greenhouse gas emissions will be released by equipment used for grading, paving, and building construction activities. GHG emissions will also result from worker and vendor trips to and from the project site. Table 7 (Construction Greenhouse Gas Emissions) summarizes the estimated yearly emissions from construction activities. Carbon dioxide emissions from construction equipment and worker/vendor trips were estimated utilizing the California Emissions Estimator Model (CalEEMod) version 2013.2.2 (see Appendix B). Construction activities are short-term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases. Because of this difference, SCAQMD recommends in its draft threshold to amortize construction emissions over a 30-year operational lifetime. This normalizes construction emissions so that they can be grouped with operational emissions in order to generate a precise project GHG inventory. Amortized construction emissions are included in Table 7.

Table 7
Construction Greenhouse Gas Emissions

Construction Year	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL*
2016	789	<1	0	792
2017	357	<1	0	358
*AMORTIZED TOTAL^*	*38*	*<1*	*0*	*38*

* MTCO2E
Note: Slight variations may occur due to rounding and variations in modeling software
^ Amortized over 30-years

Long-Term Emissions

Warehousing and distribution activities will result in continuous greenhouse gas emissions from mobile and operational sources. Mobile sources including vehicle trips to and from the project site will result primarily in emissions of CO_2 with minor emissions of CH_4 and N_2O. The most significant GHG emission from natural gas usage will be methane. Electricity usage by the warehouses and indirect usage of electricity for water and wastewater conveyance will result primarily in emissions of carbon dioxide. Disposal of solid waste will result in emissions of methane from the decomposition of waste at landfills coupled with CO_2 emission from the handling and transport of solid waste. These sources combine to define the long-term greenhouse gas emissions for the build-out of the proposed project.

To determine long-term emissions, CalEEMod was used. The methodology utilized for each emissions source is based on the CAPCOA *Quantifying Greenhouse Gas Mitigation Measures* handbook.[18] A summary of the project's net long-term greenhouse gas emissions is included in Table 8 (Operational Greenhouse Gas Emissions). Emissions are presented as metric tons of carbon dioxide equivalent (MTCO2E) meaning that all emissions have been weighted based on their Global Warming Potential (GWP) (a metric ton is equal to 1.102 US short tons).

[17] South Coast Air Quality Management District. CEQA Significance Thresholds Working Group. Meeting # 15, Main Presentation. September 28, 2010

[18] California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Emissions. August 2010

Table 8
Operational Greenhouse Gas Emissions

Source	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL*
Area	<1	<1	0	<1
Energy	288	<1	<1	289
Mobile	1,546	<1	0	1,546
Solid Waste	46	3	0	103
Water/Wastewater	234	2	<1	286
TOTAL	*2,113*	*5*	*<1*	*2,224*
* MTCO2E/YR Note: Slight variations may occur due to rounding				

Mobile sources are based on annual vehicle miles traveled (VMT) based on daily trip generation identified in the trip generation memorandum.[19] Trip lengths have been adjusted based on a study of metropolitan commercial and freight travel conducted by the National Cooperative Highway Research Program. According to observed data collected in the field for the Southern California Association of Governments (SCAG) region, trip lengths for warehouse uses are estimated at 5.92 miles for light-duty trucks, 13.06 for medium-duty trucks, and 22.40 for heavy-duty trucks. Total vehicle miles were calculated using the average daily trips for each vehicle class and divided by total daily truck trips to get to an average truck distance of 17.41 miles. Natural gas usage and electricity usage are based on default demand figures utilized in CalEEMod. Solid waste generation is also based on CalEEMod defaults.

CalEEMod does not include outdoor landscape irrigation demand defaults for warehouse uses. Estimated irrigation needs for landscaping was calculated at 2,918,860 gallons per year. Landscape irrigation requirements were calculated using the California Department of Water Resources (DWR) *Water Budget* Workbook that calculates the Maximum Applied Water Allowance (MAWA) for landscaping based on the requirements of the state water conservation in landscaping act.[20] This reflects the maximum allowable amount of water that is permitted to be used annually after consideration of effective precipitation (25 percent of annual rainfall). MAWA is calculated using the following equation:

$$MAWA = (ET_O - Eppt) * 0.62 * [(0.70 * LA) + (0.30 * SLA)]$$

Where:

MAWA = Maximum Applied Water Allowance (gallons per year)
ET_O = Reference Evapotranspiration for Locale (inches per year)
Eppt = Effective Precipitation (inches per year)
LA = Landscape Area (square feet)
SLA = Special Landscape Area (square feet)

Indoor water demand and wastewater discharges are based on CalEEMod defaults.

Greenhouse Gas Emissions Inventory

Table 9 (Greenhouse Gas Emissions Inventory) summarizes the yearly estimated greenhouse gas emissions from construction and operational sources. The total yearly carbon dioxide equivalent emissions for the proposed project are estimated at 2,262 MTCO2E. This does not exceed the SCAQMD threshold of 10,000 MTCO2E per year.

19 Kunzman Associates, Inc. Trip Generation Memorandum. October 3, 2014
20 California Department of Water Resources. Water Budget Workbook. www.water.ca.gov/wateruseefficiency/docs/WaterBudget.xls [October 2014]

Table 9
Greenhouse Gas Emissions Inventory

Source	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL*
Construction	38	<1	0	38
Operation	2,113	5	<1	2,224
			Total	**2,262**

* MTCO2E/YR
Note: Slight variations may occur due to rounding
^ Construction impacts amortized over 30-years

b) **Less than Significant Impact.** The SCAQMD supports State, Federal and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules and has established an interim Greenhouse Gas (GHG) threshold. As indicated in response A, above, the project would comply with the City's General Plan policies, Municipal Code Chapter 16.07 (Green Code), and State Building Code provisions designed to reduce GHG emissions. In addition, the project would comply with all SCAQMD applicable rules and regulations during construction of the project and, as demonstrated in the Climate Change Analysis, will not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Based upon the prepared Climate Change Analysis for this project and the discussion above, the project will not conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GHG and thus a less than significant impact will occur directly, indirectly and cumulatively in this regard.

4.8 – Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☑	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☑
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☑
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☑
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☑
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☑

a) **Less than Significant Impact.** The proposed project could result in a significant hazard to the public if the project includes the routine transport, use, or disposal of hazardous materials or places housing near a facility which routinely transports, uses, or disposes of hazardous materials. A Phase I Environmental Site Assessment was prepared for the project site on September 30, 2014 (Appendix G) by Leighton Consulting, Inc. (Leighton). According to the Phase I ESA, four facilities were identified that could be a potential concern within the EDR radius map report for the specified search distance of standard environmental record searches:

Urenas Autopart & SVC, also listed as Kings Auto Repair, is located at 13718 Old 215 Frontage Road and 82 feet east of the project site. Urenas Autopart & SVC was reported on the EDR US Hist Auto Stat, FINDS, and RCRA-SQG databases. According to the information provided, this facility generates more than 100 kilgrams (kg) but less than 1,000 kg of hazardous waste during a calendar month and generates tetrachloroethylene. This facility was listed for the years 2003, 2005, 2007, 2009, and 2010. EDR's proprietary database, US Hist Auto Stat, lists sites that were recorded as gas stations, filling stations, automobile repair shops and stations. Violations were not reported and records were not found on Geotracker. Due to the nature of this database listing and no reported violations or releases, there is a low potential for this facility to adversely affect the project site.

Arco #629, also listed as Arco AM/PM, is located at 2624 E. Alessandro Boulevard and is located 1,416 feet to the south of the project site. This facility was reported on the LUST, HAZNET, and Sweeps UST databases. According to the EDR radius map report, petroleum hydrocarbon impacted soil was encountered during site assessment and facility upgrade activities. Absorbed phase hydrocarbons were detected in the vadose zone in the vicinity of the USTs and former product dispensers to approximately 51 feet bgs. The lateral extent of the hydrocarbon impacted soil has been delineated and the facility is currently utilizing Soil Vapor Extraction (SVE) as the remediation activity. SVE activities at the facility have demonstrated the stabilization of the hydrocarbon plume and a pilot study is currently being conducted to establish the most effective remediation system for this facility. The status of this facility is "open-remediation" as of November 30, 2007. This facility was listed on the HAZNET database due to the collection of purged groundwater during groundwater monitoring activities as well as SVE remediation activities. Leighton supplemented the information from EDR by review of RWQCB's online Geotracker database. Based on the Fourth Quarter 2013 quarterly groundwater monitoring report by Stratus, groundwater gradient was reported to flow to the west-southwest, cross gradient from the project site. Due to the cross gradient location of the facility with respect to the project site, there is a low potential for this facility to adversely affect the project site.

Charlebois Liquors is located at 21840 Alessandro Boulevard and is located 0.349 miles southeast of the project site. According to the EDR radius map report, an unauthorized release of gasoline was reported on October 1, 1986. Two 10,000-gallon gasoline USTs that appeared in good condition, were removed from the site on March 29, 1990. The site was granted no further action as of February 28, 2013, based on the stabilization of the plume which had been delineated with a radius of less than 40 feet. This facility is located southeast of the project site and is considered cross gradient with respect to groundwater flow. Due to the cross gradient groundwater flow of the facility with respect to the project site and the stabilized groundwater plume, there is a low potential for this facility to adversely affect the project site.

March Air Reserve Base (March ARB), 22 CGC/CC Riverside, California 92518 is located approximately 1,100 feet to the south of the project site. March ARB was reported on the DOD, NPL, CERCLIS, RCRA-LQG, US Eng Controls, US Inst Control, ROD, NY Manifest, and PRP databases. According to the EDR radius map report, the former March Air Force Base was originally used to train pilots in World War I and by 1938, it became the central location for west coast bombing and gunnery training. Due to the facility's purpose in national defense, there was a wide variety of operations that involved the use, storage, and disposal of hazardous materials and waste such as fuel, solvents and waste oil. As a result, 30 different areas of soil and groundwater contamination have been identified on the base. By November 1989, March Air Force Base was added to the NPL due to the contamination of the groundwater. According to the EDR radius map report the facility's status is "currently on the Final NPL." Operational Units (OU) were identified on the facility based on the groundwater plumes. There were numerous contaminants of concern (COCs) detected in the groundwater at the OUs including trichloroethylene (TCE), perchloroethylene (PCE), vinyl chloride, and fuel. The area that required groundwater remediation includes the southern and eastern boundary and extends 1,500 feet south of the base property. The groundwater gradient near the subject site flows to the west. March ARB is located south of the project site and is considered cross gradient. Due to the cross gradient groundwater flow of the location of the facility with respect to the project site, there is a low potential for this facility to adversely affect the project site.

The proposed project will not necessarily, but may engage in the routine transport, use, or disposal of hazardous materials or wastes. If hazardous materials are proposed on site in the future, they will be subject to state and federal regulation for permitting and inspection by the Hazardous Materials Division of the City Fire Department. Widely used hazardous materials common at any warehouse land use include paints and other solvents, cleaners, automobile fluids, and pesticides. The remnants of these and other products are disposed of as household hazardous waste (HHW) that includes used motor oil, dead batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of at local landfills. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. Impacts associated with the routine transport, use of hazardous materials or wastes will be less than significant.

Impacts related to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials will be less than significant.

b) **Less than Significant Impact.** Construction of the proposed project and future tenant improvements will require the use and transport of hazardous materials such as asphalt, paints, and other solvents. Construction activities could also produce hazardous wastes associated with the use of such products. Construction of the proposed project requires ordinary construction activities and will not require a substantial or uncommon amount of hazardous materials to complete. Although if future tenant improvements of the proposed buildings would not be subject to CEQA review, all hazardous materials are required to be utilized and transported in accordance with their labeling pursuant to federal and state law. Because of these existing regulations, construction activities do not pose a substantial risk to the public or the environment due to the use of hazardous materials; impacts will be less than significant.

According to the Phase I ESA prepared by Leighton, one historical recognized environmental condition (HREC) was identified in connection with the project site. One former 1,000-gallon and one former 280-gallon waste oil underground storage tank were located on the project site. The Riverside County Department of Environmental Health (RCDEH) oversaw the removal of these tanks and issued a no further action letter in 2006. Additional investigation is not warranted in association with these former tanks. Impacts related to a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment will be less than significant.

c) **No Impact.** No schools are located within one-quarter mile of the project site. Therefore, no impact will occur.

d) **No Impact.** The proposed project is not located on a site listed on the State 'Cortese List', a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses. Therefore, no impact will occur.

Based upon review of the Cortese list, the project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),[21]
- listed as a leaking underground storage tank (LUFT) site by the State Water Resources Control Board (SWRCB),[22]
- listed as a hazardous solid waste disposal site by the SWRCB,[23]
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,[24] or
- developed with a hazardous waste facility subject to corrective action by the DTSC.[25]

In addition, a Phase I environmental site assessment was prepared for the project site (see Appendix G). The proposed project site was previously used for residential and commercial purposes and is currently vacant. The Phase I environmental site assessment identified evidence of one HREC, former underground storage tanks, in connection with the property. The RCDEH oversaw the removal of these tanks and issued a no further action letter in 2006. No future investigation has been warranted in association with these tanks. There will be no impact.

e-f) **No Impact.** The proposed project is within the March Air Reserve Base influence area. According to the Riverside General Plan EIR, the project site is within Accident Potential Zone II (APZ-II). The United States Air Force preformed an Air Installation Compatible Use Zone (AICUZ) that provides recommendations for compatible uses within each zone. According to Table 1 (Land Use Compatibility in APZs) in the AICUZ, warehousing and storage and related structures are normally compatible without restriction within APZ-II. Therefore, no impact will result.

g) **Less than Significant Impact.** The proposed project site is currently vacant with. The project will therefore increase trips in the area. Per state Fire and Building codes, sufficient space will have to be provided around the buildings for emergency personnel and equipment access and emergency evacuation. All project elements, including landscaping, would be sited with sufficient clearance from existing and proposed structures so as not to interfere with emergency access to and evacuation from the site. The project is required to comply with the California Fire Code (Title 24, California Code of Regulations, Section 9). The site plan includes two ingress/egress access points on Old 215 Frontage Road.

The project driveways will allow emergency access and evacuation from the site, and will be constructed to California Fire Code specifications. The project will not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Construction work in the street associated with the building will be limited to lateral utility connections that would be limited to nominal potential traffic diversion. Traffic control will be provided for any lane closures. Project impacts will be less than significant.

h) **No Impact.** The project site is surrounded to the north by single family residential, to the east by vacant land and automobile repair services, to the south by business park uses, and to the west by the I-215. According to the Riverside General Plan EIR, the project site is not located in a high fire hazard area.[26] No impact will result.

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21 California Department of Toxic Substances Control. Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm [June 2015]

22 California State Water Resources Control Board. GeoTracker. geotracker.waterboards.ca.gov [June 2015]

23 California State Water Resources Control Board. Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf [June 2015]

24 California State Water Resources Control Board. List of Active CDO and CAO. http://www.calepa.ca.gov/sitecleanup/corteselist/ [June 2015]

25 California Department of Toxic Substances Control. Hazardous Facilities Subject to Corrective Action. www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities [June 2015]

26 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

4.9 – Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☑	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☑	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☑	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☑	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☑	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☑
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☑
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☑	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☑	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☑	☐

a) **Less than Significant Impact.** Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. The project would result in a significant impact to water quality if water quality standards, waste discharge requirements, or degradation of water quality occurred.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The project consists of the development of one building totaling 245,170 square feet and does not propose any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants include:

- Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas
- Oil, grease, and toxic chemicals from urban runoff and energy production
- Sediment from improperly managed construction sites, crop and forest lands, and eroding streambanks
- Salt from irrigation practices and acid drainage from abandoned mines
- Bacteria and nutrients from livestock, pet wastes, and faulty septic systems
- Atmospheric deposition and hydromodification

Impacts associated with water pollution include ecological disruption and injury or death to flora and fauna, increased need and cost for water purification, sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading and storage areas, or result in contaminated discharges directly into the storm drain system.

The Santa Ana Regional Water Quality Control Board (RWQCB) administers the National Pollutant Discharge Elimination System (NPDES) permit in the region. The City is required to implement all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce NPS pollutant loading through the implementation of Best Management Practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water resources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and educational programs. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The proposed project would not interfere with the implementation of NPDES water quality regulations and standards.

The proposed project would disturb approximately 13.4 acres of land and therefore will be subject to National Pollutant Discharge Elimination System (NPDES) permit requirements during construction activities in addition to standard NPDES operational requirements. The proposed project will require submittal to the local reviewing agency, the Santa Ana RWQCB, a Storm Water Pollution Prevention Plan (SWPPP) that will include BMPs protects water quality during construction activities. The City will require BMPs as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. These measures, which include resident/owner education, activity restrictions, parking lot sweeping, basin inspection, landscaping, roof runoff controls, efficient irrigation, slope and channel protection, storm drain signage, trash racks, and trash storage areas, will reduce pollutants in storm water runoff and reduce non-storm water discharges to the City's storm water drainage through controlling the discharge of pollutants. Operational BMPs will be identified in a Stormwater Runoff Management Plan that will be submitted to the City for review and approval. Impacts related to violation of water quality standards will be less than significant with implementation of these existing regulations.

b) **Less than Significant Impact.** If the project removed an existing groundwater recharge area or substantially reduced runoff that results in groundwater recharge, a potentially significant impact could occur.

The site is currently vacant. The proposed project will construct impervious pavement with areas of landscaping as well as one detention basin that could provide for similar levels of groundwater recharge compared to the existing conditions. The site does not accommodate any substantial natural drainage or managed recharge areas. The project site is surrounded by single family residential to the north, vacant land and automobile repair services to the east, business park uses to the south, and the I-215 to the west. The proposed project will be served by Western Municipal Water District (WMWD). WMWD obtains approximately 90 percent of its total supply through imported water sources from Metropolitan Water District (WMD). The northern portion of the City of Riverside is served by Riverside Public Utilities (RPU) and relies on groundwater. According to the General Plan EIR, recharge areas for the primary groundwater aquifer utilized by RPU is located in other jurisdictions. Therefore, development within the City of Riverside will not affect groundwater recharge. The project site is not the location of an existing groundwater spreading basin and will not significantly change the runoff from the project that may otherwise recharge groundwater basins; therefore, impacts to groundwater recharge will be less than significant.

c) **Less than Significant Impact.** Potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the project results in substantial on- or off-site erosion or siltation. As was previously detailed in Section 3.9.b, the site is currently vacant but surrounded by various uses on all sides. The site generally surface drains to the southwest.

Proposed on-site low impact development (LID) principles include the implementation of BMPs including landscaping and bioretention areas. On-site stormwater will be collected via a bioswale and landscaping along the western boundary of the project site and a detention basin at the northwestern corner of the project site. A soil infiltration study (Appendix H) was prepared for the proposed project and determined that on-site soil conditions are suitable for stormwater infiltration and that the proposed system will be feasible for on-site disposal of stormwater. The design of the proposed project will not substantially alter drainage patterns in the area to the extent that substantial on- or off-site erosion or siltation will occur; therefore, impacts will be less than significant.

d) **Less than Significant Impact.** As was previously detailed in Section 3.9.c herein, the project will not result in an alteration of the drainage pattern or increase in flows that would result in flooding on- or off-site because all on- and off-site drainage will be controlled by storm drain and flood control facilities. The proposed project's detention basin has been designed to feasibly dispose of runoff to reduce proposed runoff to amounts that can be accommodated with existing infrastructure. Impacts to flooding on- or off-site as a result of a change in the drainage pattern or increase in runoff will thus be less than significant.

e) **Less than Significant Impact.** A potentially significant impact could occur if the project creates or contributes runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff. As was previously detailed in Section 3.9.c, project-related stormwater flows will be directed to the proposed detention basin and bioswale for on-site disposal/infiltration. The proposed water quality function of the basins would reduce

the amount of polluted runoff that would be conveyed into the groundwater and storm drain system. Impacts will be less than significant.

f) **No Impact.** The project does not propose any uses that will have the potential to otherwise degrade water quality beyond those issues discussed in Section 3.9 herein.

g) **No Impact.** The project does not include housing, therefore no impact will occur.

h) **Less than Significant Impact.** The proposed project is not located within a designated 100-year flood hazard area or zone.[27] Therefore, the project will not impede or redirect flood flows. The project will have a less than significant impact.

i) **Less than Significant Impact.** The project site is not located within a dam inundation area.[28] Impacts due to levee failure will be less than significant.

j) **Less than Significant Impact.** According to the Riverside General Plan EIR, exposure of people or structures to significant risk or loss, injury or death involving inundation by seiche and tsunami are extremely unlikely. Because the project site and the surrounding area are relatively flat, impacts related to significant mudflows will be less than significant. Impacts will be less than significant.

27 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.
28 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

4.10 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☑
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☑

a) **No Impact.** The project site is surrounded by single family residential to the north, vacant land and automobile repair services to the east, business park use to the south, and the I-215 to the west. The proposed project is consistent and compatible with the surrounding land uses and will not be dividing an established community. The project does not propose construction of any roadway, flood control channel, or other structure that would physically divide any portion of the community; therefore, no impact will occur.

b) **Less than Significant Impact.** The proposed project consists of one 245,170-square foot warehouse building. The proposed project will not conflict with any plans or programs adopted to avoid or mitigate an environmental impact. The proposed project is also subject to General Plan EIR mitigation measures designed to avoid cumulative and site specific environmental impacts, as well as other applicable regulations required to mitigate or avoid environmental impacts; therefore, there will be no conflict between the proposed project and plans, policies, or regulations designed to avoid or mitigate environmental impacts; a less than significant impact will occur.

c) **No Impact.** As discussed in Section 4.4, the project site is subject to the Riverside County Multiple Species Habitat Conservation Plan (MSHCP). All new development is required to comply with the MSHCP; therefore, no conflict will occur.

4.11 – Mineral Resources

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☑	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☑

a) **Less than Significant Impact.** The project site is located within a MRZ-4 area, which indicates that there is insufficient data to assign any other MRZ designation.[29] However, mining operations in the City have not been active for decades. According to the Riverside General Plan EIR, the maximum potential for mineral extraction has occurred; therefore the proposed project would not result in any loss of availability of any known or unknown mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and surrounding land uses would preclude mining from occurring. In addition, the designated land use for the area is incompatible for mining operations.[30] Less than significant impact will occur.

b) **No Impact.** The City's General Plan does not identify any locally important mineral resources other than those associated with past mining activities. Maximum potential for those deposits have been reached. The project site is currently vacant and is not used for mineral extraction or mining; therefore the proposed project will not result in any loss of availability of any known or unknown locally important mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and zoning and surrounding land uses would preclude mining from occurring. No impact will occur.

29 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.
30 California Department of Conservation, State Mining and Geology Board. Guidelines for Classification and Designation of Mineral Lands. 2000.

4.12 – Noise

Would the project result in:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☑	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☑	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☑	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☑	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑

Noise can be defined as unwanted sound. Sound (and therefore noise) consists of energy waves that people receive and interpret. Sound pressure levels are described in logarithmic units of ratios of sound pressures to a reference pressure, squared. These units are called *bels*. In order to provide a finer description of sound, a *bel* is subdivided into ten *decibels*, abbreviated dB. To account for the range of sound that human hearing perceives, a modified scale is utilized known as the A-weighted decibel (dBA). Since decibels are logarithmic units, sound pressure levels cannot be added or subtracted by ordinary arithmetic means. For example, if one automobile produces a sound pressure level of 70 dBA when it passes an observer, two 2 cars passing simultaneously would not produce 140 dBA. In fact, they would combine to produce 73 dBA. This same principle can be applied to other traffic quantities as well. In other words, doubling the traffic volume on a street or the speed of the traffic will increase the traffic noise level by 3 dBA. Conversely, halving the traffic volume or speed will reduce the traffic noise level by 3 dBA. A 3 dBA change in sound is the beginning at which humans generally notice a *barely perceptible* change in sound and a 5 dBA change is generally *readily perceptible*.[31]

[31] California Department of Transportation. Basics of Highway Noise: Technical Noise Supplement. November 2009.

Noise consists of pitch, loudness, and duration; therefore, a variety of methods for measuring noise has been developed. According to the California General Plan Guidelines for Noise Elements, the following are common metrics for measuring noise:[32]

L_{EQ} (Equivalent Energy Noise Level): The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over given sample periods. L_{EQ} is typically computed over 1-, 8-, and 24-hour sample periods.

CNEL (Community Noise Equivalent Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7:00pm to 10:00pm and after addition of ten decibels to sound levels in the night from 10:00pm to 7:00am.

L_{DN} (Day-Night Average Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of ten decibels to sound levels in the night after 10:00pm and before 7:00am.

CNEL and L_{DN} are utilized for describing ambient noise levels because they account for all noise sources over an extended period of time and account for the heightened sensitivity of people to noise during the night. L_{EQ} is better utilized for describing specific and consistent sources because of the shorter reference period.

a) **Less than Significant Impact.** The City of Riverside General Plan has established noise compatibility standards for land uses throughout the city.[33] Exterior noise levels for residential land uses are considered acceptable up to 55 dBA CNEL, 65 dBA CNEL for office/commercial land uses, and 70 dBA CNEL for industrial land uses. Existing land uses surrounding the project site and within the project vicinity generally consists of industrial facilities and single family residences.

Construction Noise Levels

Construction noise levels were estimated for nearby receptors using the FHWA Roadway Construction Noise Model (RCNM) (see Appendix I for RCNM outputs). Temporary noise increases will be greatest during the grading, construction, and paving phases. The model indicates that the use of construction equipment such as excavators, dozers, and pavers could expose the single family use located approximately 365 feet north of the center of the project site to a combined noise level of 67.7 dBA $L_{max.}$ Construction equipment could expose the commercial use 670 feet to the east, the multi-family use 700 feet to the east, the commercial use 748 feet to the east, and the business park 395 feet to the south from the center of the project site to a combined noise level of 62.5 dBA L_{max}, 62.1 dBA L_{max}, 61.5 dBA L_{max}, and 67.0 dBA L_{max}, respectively. Within the City of Riverside, a noise level of 65 dBA is allowable at surrounding office/commercial uses and a noise level of 55 dBA is allowable at residential uses. To the east of the project site is the City of Moreno Valley. Within the City of Moreno Valley, the maximum allowable daytime exterior noise level is 60 dBA for residential uses and 65 dBA for commercial uses. Construction activity could result in noise levels in excess of the allowable noise levels at the single family use to the north, the multi-family use to the east, and the business park to the south of the project site. Therefore, Mitigation Measures N-1 and N-2 have been incorporated to reduce the impact to neighboring uses during construction.

Per Section 7.35.10 (General Noise Regulations) of the Riverside Municipal Code, construction activities occurring between the hours of 7:00 PM and 7:00 AM on Mondays through Fridays, between 5:00 PM and 8:00 AM on Saturdays, and any time on Sundays and federal holidays are prohibited. Mitigation Measure N-1 limits construction activity to the hours of 7:00 AM and 7:00 PM Monday through Friday and the hours of 8:00 AM and 5:00 PM on Saturdays. Due to the time limitations on construction activity, surrounding employees and residents will be exposed to limited construction noise. Because noise levels during construction activities are anticipated to exceed the City's exterior noise standards, mitigation measures will be necessary to minimize noise levels at nearby receptors. Mitigation Measure N-2 will be incorporated to minimize noise

[32] California Governor's Office of Planning and Research. General Plan Guidelines. 2003
[33] City of Riverside General Plan Noise Element.

associated with general construction activities. Mitigation Measure N-2 requires preparation of a construction noise reduction plan to reduce temporary noise impacts by a minimum of 15 dBA at the single family use to the north and 5 dBA at the multi-family use to the east and the business park to the south which is a feasible performance standard based on available technology. Engineered controls include retrofitting equipment with improved exhaust and intake muffling, disengaging equipment fans, and installation of sound panels around equipment engines. These types of controls can achieve noise level reductions of approximately 10 dBA.[34] [35] If necessary, sound curtains and other noise barriers also can be used for general construction noise and achieve reductions of up to 20 dBA.[36] Implementation of Mitigation Measure N-2 will reduce temporary noise impacts by a minimum of 15 dBA at the single family use to the north of the project site and a minimum of 5 dBA at the commercial use to the east and the business park to the south of the project site, resulting in a maximum construction noise level of 52.7 dBA, 57.1 dBA, and 62 dBA, respectively. Therefore, with implementation of Mitigation Measures N-1 and N-2, construction noise will feasibly be reduced to less-than-significant levels.

Operational Noise levels

The City of Riverside Municipal Code sets an allowable exterior noise level for industrial uses at 70 dBA CNEL, and 65 dBA CNEL for public recreational facilities and office/commercial use, 60 dBA for community support uses, and 55 dBA for residential uses. Within the City of Moreno Valley, the maximum allowable daytime exterior noise level is 60 dBA for residential uses and 65 dBA for commercial uses. Ambient noise at the project site would generally be defined by traffic on Interstate 215, Old 215 Frontage Road, and Cottonwood Avenue. Traffic noise from vehicular traffic generated by the proposed project on Cottonwood Avenue and Old 215 Frontage Road was projected using SoundPLAN software was based on estimated trip generation provided by Kunzman Associates, Inc. (see Appendix I for SoundPLAN output data).

The Without Project noise levels at neighboring uses were calculated using SoundPLAN software to provide a baseline of the Opening Year 2018 traffic noise levels. A traffic study was not required for this proposed project. Therefore, the Opening Year 2018 Without Project traffic noise environment was estimated utilizing average daily traffic counts provided by Google Earth Pro for Old 215 Frontage Road and Cottonwood Avenue. Google Earth Pro average daily traffic counts for Old 215 Frontage Road and Cottonwood Avenue are from the year 2005. In order to account for growth in the area and increases in traffic volumes, a growth rate of two percent per year has been applied to the provided average daily traffic counts to bring the estimated volumes up to Opening Year 2018 (see Table 10 (Roadway Traffic Volumes). Peak hour volumes are estimated to be ten percent of average daily traffic.

Table 10
Roadway Traffic Volumes

Roadway	Opening Year 2018 Volume	Peak Hour Volumes
Old 215 Frontage Road[1]	5,047	505
Cottonwood Avenue[2]	3,156	316
1 2005 Traffic Count – 3,901 (Source: Google Earth Pro) *2 2005 Traffic Count – 2,439 (Source: Google Earth Pro)*		

Noise levels at the residential uses to the north, east, and northeast, the commercial uses to the east, and the business park use to the south were calculated and projected at the ground floor. The 2018 Opening Year Without and With Project traffic noise levels during the peak hour at neighboring uses are summarized in Table 11 (Peak Hour Roadway Noise Levels). Opening Year Without and With project exterior noise levels will be within the allowable exterior noise levels established by the City of Moreno Valley for the commercial (Receptor #2 and #4) and residential (Receptor #3) uses to the east and within the established City of Riverside exterior noise standard for the business park to the south (Receptor #5). The exterior noise levels under the Without and With project scenarios exceed allowable exterior noise levels at the residential uses to the

34 United States Bureau of Mines. Mining Machinery Noise Control Guidelines. 1983
35 United States Bureau of Mines. Noise Abatement Techniques for Construction Equipment. August 1979
36 Sound Seal. Sound Seal Sound Curtains Exterior Grade Noise Control. http://www.soundcurtains.com/exterior-grade-noise-control.pdf [October 2014]

north and northeast within both the City of Riverside (Receptor # 1) and the City of Moreno Valley (Receptor # 6 and #7). However, the project does not cause the exterior noise levels to exceed the 70 dBA industrial threshold or the 55 dBA residential threshold for receptors that are currently below the allowable noise levels. Therefore, no significant impacts will result.

Table 11
Peak Hour Roadway Noise Levels

Receptors	Without Project dBA CNEL	With Project dBA CNEL
1 – Single Family Residential (N)	**57.8**	**58.0**
2 – Commercial (E)*	62.5	62.8
3 – Multi-Family Residential (E)*	59.2	59.6
4 – Commercial (E)*	62.7	63.0
5 – Business Park (S)	52.5	52.8
6 – Single Family Residential (NE)*	**71.2**	**71.4**
7 – Multi-Family Residential (NE)*	**69.6**	**69.8**
* Within the City of Moreno Valley		

Mitigation Measures

N-1 Limit construction activities to the hours of 7:00 AM to 7:00 PM Monday through Friday and the hours of 8:00 AM to 5:00 PM on Saturdays. Construction activity shall be prohibited on Sundays and federal holidays. This mitigation measure must be implemented throughout construction and may be periodically monitored by the Planning Director or designee during routine inspections.

N-2 Prior to issuance of grading permits, the Applicant shall submit a mitigation plan prepared by a qualified engineer or other acoustical expert for review and approval by the Planning Division that identifies noise control measures that achieve a minimum 15 dBA reduction at the single family use to the north of the project site and a minimum 5 dBA reduction at the commercial use to the east and the business park to the south of the project site in construction-related noise levels. The mitigation plan may include use of vibratory pile drivers or other pile driving noise controls, sound curtains, engineered equipment controls, or other methods. Noise control requirements shall be noted on project construction drawings and verified by the Building Department during standard inspection procedures.

Impact on Proposed Use

An acoustical analysis has been prepared by P.A. Penardi & Associates (Appendix J) to ensure compliance with the Acoustical Control section of the 2013 California Green Building Standards Code (CALGreen) for the proposed building. The purpose of the analysis was to assess exterior noise impacts onto the proposed building resulting from any significant nearby transportation sources. Section 5.507 (Environmental Comfort) of the standards was modified to specify certain noise control measures for non-residential buildings in the event that exterior noise impacts were to exceed 65 dBA CNEL resulting from transportation noise sources or industrial sources. The main areas of concern are the office spaces of non-residential buildings. The standards do not apply to interior areas where occupants are not likely to be affected such as warehouse uses.

The City of Riverside General Plan Noise Element shows the project site within the 65 to 70 dBA CNEL noise contour for I-215 noise. At midday on May 20, 2015, noise measurements were made on the project site and within the existing buildings to the south of the project site. The project site is unique in that it is elevated above the freeway grade and, as such, topography serves to partially shield the vehicles from view and to attenuate some of the freeway noise. Noise measurements made on the project site at the location of the proposed office areas shown an average noise level for the noontime hour of approximately 50 dBA L_{eq}. Noise measurements made in the existing buildings to the south of the project

site showed a similar noise level (measurements were made on the east side of one of the buildings located adjacent to the freeway to evaluate the shielded noise provided by the building which helped to predict the effect of a similar situation for the office areas on the east elevation of the proposed building). With the exterior freeway noise impact being less than 60 dBA L_{eq}, the results of the analysis, therefore, show compliance with the acoustics section of CALGreen. Impacts will be less than significant.

b) **Less than Significant Impact.** Vibration is the movement of mass over time. It is described in terms of frequency and amplitude and unlike sound; there is no standard way of measuring and reporting amplitude. Vibration can be described in units of velocity (inches per second) or discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration. Vibration impacts to buildings are generally discussed in terms of peak particle velocity (PPV) that describes particle movement over time (in terms of physical displacement of mass). For purposes of this analysis, PPV will be used to describe all vibration for ease of reading and comparison. Vibration can impact people, structures, and sensitive equipment. The primary concern related to vibration and people is the potential to annoy those working and residing in the area. Vibration with high enough amplitudes can damage structures (such as crack plaster or destroy windows). Groundborne vibration can also disrupt the use of sensitive medical and scientific instruments such as electron microscopes. Common sources of vibration within communities include construction activities and railroads.

According to the Caltrans vibration manual, large bulldozers, vibratory rollers (used to compact earth), and loaded trucks utilized during grading activities can produce vibration, and depending on the level of vibration, could cause annoyance at uses within the project vicinity or damage structures. Caltrans has developed a screening tool to determine if vibration from construction equipment is substantial enough to impact surrounding uses.

The Caltrans vibration manual establishes thresholds for vibration impacts on buildings and humans. These thresholds are summarized in Tables 12 (Vibration Damage Potential Threshold Criteria) and 13 (Vibration Annoyance Potential Threshold Criteria).

Table 12
Vibration Damage Potential Threshold Criteria

Structural Integrity	Maximum PPV (in/sec)	
	Transient	Continuous
Historic and some older buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial and commercial structures	2.00	0.50
Source: Caltrans 2013		

Table 13
Vibration Annoyance Potential Threshold Criteria

Human Response	PPV Threshold (in/sec)	
	Transient	Continuous
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.90	0.10
Severely perceptible	2.00	0.40
Source: Caltrans 2013		

Construction Vibration

Construction activities that use vibratory rollers and bulldozers are repetitive sources of vibration; therefore, the *continuous* threshold is used. Industrial uses are located to the north and east of the project site. As a worst case scenario, the *historic and some older buildings* threshold is used. Based on the threshold criteria summarized in Tables 12 and 13, vibration from

use of heavy construction equipment for the proposed project would be below the thresholds to cause damage to nearby structures and result in less than *barely perceptible* vibration at the four receptors shown in Table 14 (Distances to Vibration Receptors) and Table 15 (Construction Vibration Impacts).

Table 14
Distances to Vibration Receptors

Receptors	Distance from Center of Project Site (ft)
1 – Single Family Residential (N)	365
2 – Commercial (E)*	670
3 – Multi-Family Residential (E)*	700
4 – Commercial (E)*	748
5 – Business Park (S)	395

Construction of the project does not require rock blasting, pile driving, or the use of a jack hammer, but will use a vibratory roller, and large bulldozer, and loaded trucks. All of the receptors will experience less than *barely perceptible* vibration from construction of the proposed project. Furthermore, these construction activities will be limited to the hours of 7:00 AM to 7:00 PM Mondays through Friday and the hours of 8:00 AM to 5:00 PM on Saturdays. With regard to long-term operational impacts, activities associated with the project will not result in any vibration-related impacts to adjacent or on-site properties.

Table 15
Construction Vibration Impacts

Receptors	Equipment	PPVref	Distance (feet)	PPV
1 – Single Family Residential (N)	Vibratory Roller	0.21	365	0.0064
2 – Commercial (E)	Vibratory Roller	0.21	670	0.0029
3 – Multi-Family Residential (E)	Vibratory Roller	0.21	700	0.0028
4 – Commercial (E)	Vibratory Roller	0.21	748	0.0025
5 – Business Park (S)	Vibratory Roller	0.21	395	0.0058
1 – Single Family Residential (N)	Large Bulldozer	0.089	365	0.0027
2 – Commercial (E)	Large Bulldozer	0.089	670	0.0012
3 – Multi-Family Residential (E)	Large Bulldozer	0.089	700	0.0012
4 – Commercial (E)	Large Bulldozer	0.089	748	0.0011
5 – Business Park (S)	Large Bulldozer	0.089	395	0.0025
1 – Single Family Residential (N)	Loaded Truck	0.076	365	0.0023
2 – Commercial (E)	Loaded Truck	0.076	670	0.0011
3 – Multi-Family Residential (E)	Loaded Truck	0.076	700	0.0010
4 – Commercial (E)	Loaded Truck	0.076	748	0.0009
5 – Business Park (S)	Loaded Truck	0.076	395	0.0021

c) **Less than Significant Impact.** A substantial increase in ambient noise is an increase that is *barely perceptible* (3 dBA). Operationally, the proposed project will result in periodic landscaping and other occasional noise generating activities. These activities are common in urban uses and do not represent a substantial increase in periodic noise in consideration that the project site is located in an industrialized area. Traffic noise levels will not increase more than 3 dBA as a result of the proposed project as shown in Table 16 (Peak Hour Change in Noise Levels).

Table 16
Peak Hour Change in Noise Levels

Receptors	Without Project dBA CNEL	With Project dBA CNEL	Difference	Significant?
1 – Single Family Residential (N)	57.8	58.0	+0.2	No
2 – Commercial (E)	62.5	62.8	+0.3	No
3 – Multi-Family Residential (E)	59.2	59.6	+0.4	No
4 – Commercial (E)	62.7	63.0	+0.3	No
5 – Business Park (S)	52.5	52.8	+0.3	No
6 – Single Family Residential (NE)	71.2	71.4	+0.2	No
7 – Multi-Family Residential (NE)	69.6	69.8	+0.2	No

.

d) **Less than Significant Impact with Mitigation Incorporation.** As discussed in question a) above, implementation of Mitigation Measures N-1 and N-2 will feasibly reduce temporary construction noise to within the allowable noise levels at neighboring land uses. Impacts related to temporary construction noise will be less than significant with mitigation incorporated.

Operationally, the project will result in periodic landscaping and other occasional noise generating activities. These activities are common in industrial uses and do not represent a substantial increase in periodic noise in consideration that the project vicinity is characterized primarily by industrial uses. Furthermore, the project is subject to Zoning Code Section 7.25.010 that limits noise levels to 70 dBA for industrial land uses. With compliance with this existing regulation, periodic operational noise increases will be less than significant.

e,f) **No Impact.** The proposed project is within the March Air Reserve Base (March ARB) influence area. According to the Riverside General Plan EIR, the project site is within the 65 CNEL noise contour for March ARB. Section 7.35.010 of the Riverside Municipal Code allows an exterior noise level of 70 dBA for industrial uses. Therefore, no impact will result.

4.13 – Population and Housing

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☑	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑

a) **Less than Significant Impact.** The 2012 Regional Transportation Plan (RTP) growth projections are developed utilizing a comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans. Growth projections for the 2012 RTP predicted a citywide employment growth between 2008 and 2020 of approximately 45,800 and 66,300 by 2035. Based on average employees per square foot of warehouse in Riverside County, the proposed project is estimated to generate 422 new employees in the area. This project's estimated 422 employees are within the citywide projection for 2020 and 2035 respectively. This project would accommodate additional local employment that is well within the growth forecasts developed for the RTP. Furthermore, the project does not include any infrastructure extension or expansion and therefore will not result in any indirect population growth. Impacts will be less than significant.

b) **No Impact.** The project site is currently vacant. There are no existing housing units located on the project site; therefore, the proposed project will not involve the displacement of existing hosing necessitating the construction of replacement housing elsewhere. No impact will occur.

c) **No Impact.** Displacement, in the context of housing, can generally be defined as persons or groups of persons who have been forced or obliged to flee or to leave their homes or places of habitual residence.[37] The project site is currently vacant. Because there are no existing housing units located on the project site, development of the proposed warehouse building will not result in the displacement of any persons or groups of persons who have been forced or obliged to flee or leave. As such, there is no *forced or obliged* removal of persons, and therefore no displacement. No impact will occur.

[37] The Brookings Institute. Handbook for Applying the Guiding Principles on Internal Displacement. 1999.

4.14 – Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Fire protection?	☐	☐	☑	☐
b) Police protection?	☐	☐	☑	☐
c) Schools?	☐	☐	☑	☐
d) Parks?	☐	☐	☐	☑
e) Other public facilities?	☐	☐	☑	☐

a) Less than Significant Impact. The City of Riverside Fire Department provides fire protection and emergency medical response services in the City of Riverside. The project site is primarily serviced by Station No. 13, located at 6490 Sycamore Canyon, approximately 1.7 miles northwest of the project site.

The project is a proposed development of a vacant site in a primarily office park and commercial area. The project is located within the service area of the Riverside Fire Department, which has 14 stations. Therefore, the project will not have a significant impact on fire response times and will not otherwise create a substantially greater need for fire protection services than already exists that would necessitate construction of new facilities. No new or expanded fire protection facilities would be required as a result of this project because the project is within the existing service area of the Fire Department. Furthermore, the proposed project does not propose to use substantially hazardous materials or engage in hazardous activities that will require new or modified fire protection equipment to meet potential emergency demand. Any incremental impacts on level of service will be offset by the payment of development impact fees and property taxes. Impacts related to expansion of fire protection services will be less than significant.

b) Less than Significant Impact. The City of Riverside Police Department provides police protection services in the City of Riverside. The project site is serviced by the East Policing Center.

The proposed project will not result in any unique or more extensive crime problems that cannot be handled with the existing level of police resources. The proposed project is located within the Riverside Police Department service area. No new or expanded police facilities will need to be constructed as a result of this project because the project is within the existing service area of the Police Department. Any incremental impacts on level of service will be offset by the payment of development impact fees and property taxes. Impacts related to expansion of police protection services will be less than significant.

c) Less than Significant Impact. The proposed project will result in indirect incremental population growth and potential associated growth in students, within the Moreno Valley Unified School District. In accordance with California Government Code and the Moreno Valley Unified School District, a standard school facility impact fee will be paid to offset any incremental impacts of the proposed project. Impacts to the school facilities will be less than significant.

d) No Impact. The proposed project will not result in direct population growth that would incrementally impact recreation facilities. Impacts to recreation facilities are further discussed in Section 4.15 (Recreation). Any expansion or new construction of recreation facilities resulting from the proposed project will be subject to its own environmental review pursuant to CEQA. No impact will occur.

e) Less than Significant Impact. The proposed project will result in employment growth and indirectly in population growth that would incrementally impact other public services such as libraries or hospitals. Any incremental impact would be addressed through payment of property taxes that go to serve City and County public services. With the payment of development impact fees and property taxes, a less than significant impact will occur.

4.15 – Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☑
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☑

a) **No Impact.** The proposed project will not directly result in population growth that would impact recreation facilities. However, the addition of employees to the project vicinity will result in increased use of local park facilities. Pursuant to Riverside Municipal Code Chapters 16.60 (Local Park Development Fees) and 16.44 (Regional Parks and Reserve Parks Development Fee), a Local Park Development Fee and a Regional Park and Reserve Park Development Fee is imposed on the construction or placement of all nonresidential units and new dwelling units. Dedication of park land in lieu of payment of all or a portion of the Local Park Development Fee may be accepted by the City Council. Credits for Regional Park Fees can be requested with the donation of land adjoining a regional park or land that is situated in a planned regional park or reserve park as shown in the City's General Plan. With payment of the required Park Development Fees, dedication of land in lieu of payment, or donation of land to the regional park system, no impact will occur.

b) **No Impact.** The proposed project requires no on- or off-site construction of recreational facilities. No impact will occur.

4.16 – Transportation and Traffic

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☑	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☑	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☑	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☑	☐
e) Result in inadequate emergency access?	☐	☐	☑	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☑	☐

a) **Less than Significant Impact.** Construction of the proposed project could reduce the performance of the circulation system if the project-related vehicle trips or any proposed improvements decrease the Level of Service (LOS) on existing streets. In addition, impacts could occur if project improvements reduce the performance of any mode of transportation including mass transit and non-motorized travel.

The project site has been designed to take direct access via two driveways on Old 215 Frontage Road. Old 215 Frontage Road is a four-lane divided roadway that is aligned northwest to southeast. Regional access to the project site is provided by I-215 freeway, SR-60 freeway, and SR-91 freeway.

According to the City of Riverside Public Works Department Traffic Impact Analysis Preparation Guide, December 2014, a traffic impact analysis exemption may exist for the following types of development proposals per approval from the Public Works Department and Planning Division:

1) All residential parcel maps (4 lots or fewer)
2) Single Family Residential Tracts 10 lots or less
3) Apartments and other Multiple Family projects 75 units or less
4) Plot Plan and Use Cases for projects of one acre or less
5) Lodges, Community Centers, Neighborhood Parks and Community Parks
6) Commercial Storage Facilities
7) Congregate Care Facilities that contain significant special services, such as medical facilities, dining facilities, recreation facilities and support retail facilities.
8) Level 1 Project (51-200 peak hour trips) in areas where a current comprehensive traffic analysis exists, infrastructure funding mechanism are in place, or roadway system is built out in accordance with the 2025 General Plan within a 0.25 mile radius of the project. The Public Works Department may, however, require a local/focused traffic impact study for projects that exhibit potential adverse impacts of the circulation system.
9) Any use which can demonstrate, based on the Trip Generation Manual published by the Institute of Traffic Engineers (ITE) or other approved trip generation data, during the peak hours on the roadway, trip generation of less than 50 vehicle trips.

According to Kunzman Associations, the proposed project meets the City of Riverside traffic impact analysis exemption criteria (criteria 9), as the proposed project is projected to generate less than 50 peak hour trips during both the morning peak hour and the evening peak hour (Appendix K). Therefore, a traffic study was not required.

Trip Distribution

The trips generated by the project are determined by multiplying an appropriate trip generation rate by the quantity of land use. Trip generation rates are predicated on the assumption that energy costs, the availability of roadway capacity, the availability of vehicles to drive, and lifestyles remain similar to what are known today. A major change in these variables may affect trip generation rates.

Trip generation rates were determined for daily traffic, morning peak hour inbound and outbound traffic, and evening peak hour inbound and outbound traffic for the proposed land use. By multiplying the trip generation rates by the land use quantity, the traffic volumes are determined. Table 17 (Proposed Trip Generation) exhibits the trip generation rates, project peak hour volumes, and project daily traffic volumes for the proposed project land use. The trip generation rates are from the Institute of Transportation Engineers, Trip Generation, 9th Edition, 2012 and City of Fontana, Truck Trip Generation Study, August 2003. Passenger Car Equivalent factors have been recommended by the San Bernardino Associated Governments.

Table 17 below details anticipated trip generation for the proposed development. The proposed project is anticipated to generate a total of 404 average daily trips (ADT), 26 AM peak hour trips, and 28 PM peak hour trips and 530 ADT, 34 AM peak hour trips, and 36 PM peak hour trips in passenger car equivalents.

Table 17
Proposed Trip Generation

Land Use	ADT	AM Peak	PM Peak
Vehicle Trips	404	26	28
Passenger Car Equivalents	530	34	36
Source: Kunzman Associates, Inc., 2015			

b) **Less than Significant Impact.** The proposed project could result in significant impacts if it conflicts with the Riverside County Congestion Management Program (CMP) through reducing the Level of Service of a non-exempt segment to fall to "F". If LOS for a non-exempt segment is reduced to "F", a deficiency plan outlining specific mitigation measure and a schedule for mitigating the deficiency will be required. The nearest affected CMP designated freeways are I-215, SR-60, and SR-91 and the nearest arterial link is Alessandro Boulevard. A traffic study was not required because the proposed project will result in less than 50 peak hour trips; therefore, LOS on CMP designated freeways and roadways will not occur. Impacts will be less than significant.

c) **Less than Significant Impact.** The proposed project is located approximately two miles north of the March Air Reserve Base and is located within the influence area. According to the Riverside General Plan EIR, the project site is within Accident Potential Zone II (APZ-II). The United States Air Force preformed an Air Installation Compatible Use Zone (AICUZ) that provides recommendations for compatible uses within each zone. According to Table 1 of the AICUZ, warehousing and storage and related structures are normally compatible without restriction within APZ-II. The proposed building would not encroach into air traffic space and this project would have no effects on demand for local air service or volumes of air traffic. According to the Riverside General Plan EIR, implementation of the General Plan is not expected to result in a change in air traffic patterns and impacts associated with air traffic patterns are less than significant. The proposed project is consistent with the General Plan land use designation for the project site; therefore no impacts will be less than significant.

d) **Less than Significant Impact.** If the project will substantially increase hazards due to a design feature, a significant impact could occur. No existing traffic hazards are known to exist in the immediate vicinity of the project. Roadways and intersections provide sufficient sight distance to limit the potential of any hazards and stop signs and traffic signals are placed at intersections to safely control traffic movements. Impacts from the project will be less than significant to any potentially existing or future traffic hazard.

e) **Less than Significant Impact.** The proposed project will be accessible via two 40-foot wide driveways on Old 215 Frontage Road. Interior drive aisles along the northern, southern, and western sides of the building will have a minimum width of 30 feet to provide adequate truck and emergency access as required by the Fire Department. The interior drive aisle within the passenger car parking areas in the northeastern and southeastern portions of the site will be 26 feet wide. Access and turning radii entering the site and within the site are adequate to serve the site in case of an emergency. Therefore, the project will have less than significant impacts on the provision of adequate emergency access.

f) **Less than Significant Impact.** The project will not result in conflicts with adopted policies or plans related to alternative modes of travel, such as bus transit, bicycles or walking paths. The project is not located adjacent to or near an existing bike path or pedestrian facilities it could conflict with, nor does the City have adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities that apply to the proposed project site. Therefore, a less than significant impact will occur.

4.17 – Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☑	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☑	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☑
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☑	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☑	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☑	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☑

a) **Less than Significant Impact.** The proposed project could affect Regional Water Quality Control Board treatment standards by increasing wastewater production, which would require expansion of existing facilities or construction of new facilities. Exceeding the RWQCB treatment standards could result in contamination of surface or ground waters with pollutants such as pathogens and nitrates.

The City of Riverside Public Works Department provides sewer service to the project area. The City of Riverside Public Works Department provides for the collection, treatment and disposal of wastewater at the project site through its Riverside Regional Water Quality Treatment Plant (RRWQCP) and complies with state and federal requirements governing the

treatment and discharge of wastewater. The wastewater collection system includes over 776 miles of gravity sewers that range in size from six to 54 inches in diameter and includes 18 wastewater pump stations. According to the City of Riverside 2010 Urban Water Management Plan, RRWQCP treats approximately 34 million gallons per day (MGD). The capacity of the plant is 40 MGD. The plant is currently being expanded and retrofitted to meet the needs of future generations. This expansion will increase the capacity to 46 MGD by the end of 2015. With improved treatment processes being added, the ultimate plant capacity is anticipated to be 52 MGD.[38] Final plant expansion is anticipated to occur in 2026. Sewer connection fees will be determined as outlined under Section 14.08.080 of the City's Municipal Code. Wastewater flows associated with the proposed project would consist of the same kinds of substances typically generated by commerce use and no modifications to any existing wastewater treatment systems or construction of any new ones would be needed to treat this project's wastewater. Estimated wastewater generated by the proposed development is approximately 128,081.9 gallons per day (gpd) (wastewater is estimated to be 80 percent of total water use). This volume is within RRWQCP's remaining treatment capacity (40 MGD – 34 MGD = 6 MGD). This project would thus have a less-than-significant impact on the ability of the RRWQCP to operate within its established wastewater treatment requirements, which are enforced via the facility's NPDES permit authorized by the Santa Ana Regional Water Quality Control Board (SARWQCB). Therefore, the project will have a less than significant impact related to wastewater treatment requirements of the SARWQCB.

b) **Less than Significant Impact.** The Western Municipal Water District (WMWD) provides water service to the project area, and will provide water service to the proposed project upon completion of financial arrangements and compliance with the Department's Rules and Regulations for the installation of water facilities. Sections 10910-10915 of the state Water Code require the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for any subdivision that involves the construction of more than 500 dwelling units, or the equivalent thereof. As the project is below the established thresholds, no WSA is required.[39] WMWS projects adequate water supplies for the project area based upon current water supply and projected growth rates, estimated between 2010 and 2035.[40] The 2010 water usage in the WMWD service area was approximately 85,634 AFY and is expected to increase steadily through to 2035. The proposed water use in 2035 is estimated to be 156,231 AFY, an increase of 70,597 AFY. Total WMWD water supply in 2010 totaled 151,778 AFY and is projected to reach 238,185 AFY utilizing existing supplies. With planned supplies detailed below, the WMWD service area supply is expected to reach 248,065 AFY. WMWD has taken action to better utilize available resources, including:

- Implementation of conservation programs
- Pursuit of local Santa Ana River water supplies
- Joining the Chino Desalter Authority
- Cooperating in the construction of facilities to treat and utilize local Chino Basin Groundwater supplies.

According to the WMWD 2010 UWMP, local groundwater and other water purchased through agreements are considered 100 percent reliable in single-dry or multiple dry years, except for the Temecula-Murrieta Basin supply. WMWD has only been pumping water from the Temecula-Murrieta Basin since late 2005 and does not have long-term records on water available from this source. To be conservative, until more data is available, WMWD is assuming that its use of Temecula-Murrieta Basin water could be reduced by 15 percent in a single-dry or multiple dry years. Based on CalEEMod assumptions, the proposed project's estimated water demand is approximately 179.3 AFY, which is well within the remaining projected use. The proposed project is designed to support typical warehouse use. Should a heavy utility use be proposed as a tenant, further City review and approval will be required.

Regarding wastewater facilities, as discussed in the preceding response, wastewater generated at the project site is treated at the Riverside Regional Water Quality Treatment Plant (RRWQCP). The proposed project is estimated to have a wastewater generation of approximately 128,081.9 gpd. This generation is well within the existing remaining treatment capacity of the RRWQCP.

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38 City of Riverside Public Utilities. Final 2010 Urban Water Management Plan. July 2011.

39 Correspondence with Michael L. Plinski, P.E., Senior Water Engineer, Riverside Public Utilities. November 26, 2013.

40 Western Municipal Water District. Final 2010 Urban Water Management Plan. June 2011.

Connections to local water and sewer mains would involve temporary and less than significant construction impacts that would occur in conjunction with other on-site improvements. No additional improvements are needed to either sewer lines or treatment facilities to serve the proposed project. Standard connection fees will address any incremental impacts of the proposed project. Therefore, the project will result in less than significant impacts as a result of new or expanded wastewater treatment facilities.

c) **No Impact.** Potentially significant impacts could occur as a result of this project if storm water runoff was increased to a level that would require construction of new storm drainage facilities. As discussed in the Hydrology section, the proposed project would not generate any increased runoff from the site that would require construction of new storm drainage facilities. The City's NPDES permit requires most new development projects to incorporate best management practices to minimize pollutant levels in runoff. Pursuant to Riverside Municipal Code Chapter 14.12 (Discharge of Wastes into Public Sewer and Storm Drain Systems), all construction projects shall apply Best Management Practices (BMPs) such as sediment barriers, plastic sheeting, detention ponds, filters and berms to prevent erosion. Implementation of BMPs would reduce pollutants in stormwater and urban runoff from the project site. The proposed storm drainage system and BMPs must be designed to the satisfaction of the City's Public Works Director and in conformance with all applicable permits and regulations. The project applicant/developer would be required to provide all necessary on-site infrastructure. The project will have a less than significant impact on requiring the construction of new facilities or expansion of existing storm drainage facilities.

d) **Less than Significant Impact.** The project could result in significant impacts if the project required additional water supplies than are currently entitled. As discussed in b) above, water demand within the WMWD service area is projected to be 156,231 AFY by 2035. The proposed project's estimated water demand is approximately 179.3 AFY, which is well within the remaining projected use. The project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies.

e) **Less than Significant Impact.** As detailed in Sections 4.17.a) and 4.17.b), the proposed project will be adequately served by existing facilities. Therefore a less than significant impact will occur.

f) **Less than Significant Impact.** Significant impacts could occur if the proposed project will exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. The City of Riverside Public Works Department collects trash from 70 percent of all households. The remaining portions of the City's solid waste are serviced by private collectors.[41] Regional landfill capacity fluctuates daily and is regularly monitored by the County Sanitation Districts of Riverside County to ensure there is sufficient landfill space available to dispose of municipal solid wastes throughout the region. This project's additional solid waste stream would have a less than significant impact on regional landfill capacity. Cities must meet the 50% landfill diversion mandate required by State law. General Plan Policy PF-5.1 states that waste should be diverted from landfills and states that the City should achieve 100% recycling citywide for both residential and non-residential development. In 2013, the per employee disposal rate was 14.0 pounds per day, below the target of no more than 19.5 pounds per day.[42] According to the California Department of Resources Recycling and Recovery (CalRecycle), the City disposes of waste at several area landfills, including:

- Badlands Sanitary Landfill
- El Sobrante Landfill
- Puente Hills Landfill (Closed 2013)
- Olinda Alpha Sanitary Landfill
- San Timoteo Sanitary Landfill
- Simi Valley Landfill & Recycling Center

41 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

42 CalRecycle. Facility/Site Summary Details, Jurisdiction Diversion/Disposal Rate Summary. http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPost2006.aspx [June 2015]

- California Street Landfill
- Mid-Valley Sanitary Landfill
- Azusa Land Reclamation Co. Landfill
- Chiquita Canyon Sanitary Landfill
- Antelope Valley Public Landfill
- American Avenue Disposal Site
- McKittrick Waste Treatment Site

The majority of waste in 2013 went to the Badlands Sanitary Landfill and the El Sobrante Landfill.[43] The Badlands Sanitary Landfill, located in Moreno Valley, has a permitted daily capacity of 4,000 tons, with a permitted total capacity of 33,560,993 cubic yards and a remaining capacity of 14,730,025 cubic yards. This landfill is projected to close in 2024.[44] The El Sobrante Landfill, located in Corona, has a permitted daily capacity of 16,054 tons per day and a total capacity of 184,930,000 tons, with a remaining capacity of 145,530,000 tons. This landfill is estimated to close in 2045.[45] Although these existing landfills currently used by Riverside are anticipated to close in 2024 and 2045, other regional landfills have remaining capacity. Also, regional plans are underway to transport waste by rail to landfill sites in the desert areas to the east.

Different uses have varying levels of estimated solid waste production. Using the default calculations in the CalEEMod model, the proposed Project will generate approximately 225.7 tons of solid waste per year. There is adequate landfill capacity in the region to accommodate project-generated waste. Considering the availability of landfill capacity and the relatively nominal amount of solid waste generation from the proposed project, project solid waste disposal needs can be adequately met without a significant impact on the capacity of the nearest and optional, more distant, landfills. Therefore, it is not expected that the proposed project would impact the City's compliance with state-mandated (AB 939) waste diversion requirements. Impacts will be less than significant.

g) **No Impact.** The proposed project is required to comply with all applicable federal, state, County, and City statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact will occur.

43 CalRecycle. Jurisdiction Disposal by Facility. http://www.calrecycle.ca.gov/LGCentral/Reports/DRS/Destination/JurDspFa.aspx [June 2015]

44 CalRecycle. Facility/Site Summary Details: Badlands Sanitary Landfill (33-AA-0006) http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0006/Detail/ [June 2015]

45 CalRecycle. Facility/Site Summary Details: El Sobrante Landfill (33-AA-0217) http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0217/Detail/ [June 2015]

4.18 – Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☑	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☑	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☑	☐	☐

a) **Less than Significant with Mitigation Incorporation.** The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area and will not result in significant impacts related to light and glare, as discussed in Section 4.1. The proposed project would not significantly impact any sensitive plants, plant communities, fish, or wildlife, as discussed in Section 4.4. Adverse impacts to historic resources would not occur. Construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading, consistent with Mitigation Measures C-1 and C-2. This site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section 4.2 concludes that impacts related to emissions of criteria pollutants and other air quality impacts will be less than significant with mitigation incorporated during construction activities. Section 4.7 concludes that impacts related to climate change would be less then significant. Section 4.9 concludes that impacts related to hydrology and water quality will be less than significant. Based on the preceding analysis of potential impacts in the responses to items 4.1 thru 4.17, no evidence is presented that this project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporation.

b) **Less than Significant with Mitigation Incorporation.** Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project.

Non-Cumulative Impacts

Impacts related to aesthetics, geology and soils, and airport hazards at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to these topics will occur.

Local Impacts

Projects can contribute considerably to cumulative impacts in context of the local environment. Local cumulative impacts are limited to agricultural and forestry resources, air quality, biological resources, cultural resources, hazardous materials, wildfires, groundwater levels, drainage and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. A general discussion of potentially significant cumulative impacts in the local context is summarized below.

The analysis provided in Sections 4.2 and 4.16 found that no individual impacts would occur; therefore, the project could not contribute considerably to local agricultural resources or recreation impacts. The analysis provided in Section 4 related to biology, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, transportation and traffic, and utilities and service systems found that impacts would be less than significant; therefore, while the project will contribute to localized cumulative impacts, the project contribution will not be considerable.

Impacts related to air quality, cultural resources, and noise were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the project could contribute considerably to significant localized cumulative impacts in these topical areas. These topics are discussed in detail below.

Air Quality. The analysis provided in Section 4.3 related to air quality found that impacts would be less than significant with mitigation incorporated during construction activities; therefore, while the project will contribute to localized or regional cumulative impacts, the project contribution will not be considerable.

Cultural Resources. The context for assessing cumulative impacts to local archeological knowledge of our past is the geographical extent of local historic and pre-historic knowledge. Loss of on-site archaeological resources could reduce or eliminate important information relevant to the City of Riverside and/or the Inland Empire. Mitigation Measures C-1 and C-2 have been incorporated requiring evaluation of any discovered potential archaeological resources, the uniqueness of the archaeological sample, and appropriate steps to preserve or curate the artifact. This will eliminate any potential loss of important local archaeological information that may be buried under the project site; therefore, the project will have no contribution to a cumulative loss of important local archaeological knowledge.

Noise. The project is not a substantial source of operational noise, as discussed in Section 4.12.C, and therefore would not contribute considerably to noise levels in the immediate vicinity of the project. The project will contribute to temporary increases in noise levels in the immediate project vicinity during construction activities; however, Mitigation Measures N-1 and N-2 will be incorporated to minimize construction-related noise and therefore the project's contribution will not be considerable. The project will increase traffic in the project area; however, project traffic-related noise will not be discernible (as discussed in Section 4.12.C) to the public and therefore will have no considerable contribution to cumulative traffic-related noise.

Regional Impacts

Projects can contribute considerably to cumulative impacts in context of the regional environment. Regional cumulative impacts are limited to air quality, biological resources, cultural resources, hazardous materials, wildfires, groundwater levels, drainage and water quality, flooding, land use and planning, mineral resources, transportation and traffic, and utilities and service systems. A general discussion of potentially significant cumulative impacts in the regional context is summarized below.

The analysis provided in Sections 4.2 and 4.16 found that no individual impacts would occur; therefore, the project could not contribute considerably to regional agricultural resources or recreation impacts. The analysis provided in Section 4 related to air quality, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, transportation and traffic, and utilities and service systems found that impacts would be less than significant; therefore, while the project will contribute to regional cumulative impacts, the project contribution will not be considerable.

Impacts related to air quality, cultural resources, and noise were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the project could contribute considerably to significant localized cumulative impacts in these topical areas. These topics are discussed in detail below.

Air Quality. The analysis provided in Section 4.3 related to air quality found that impacts would be less than significant with mitigation incorporated during construction activities; therefore, while the project will contribute to localized or regional cumulative impacts, the project contribution will not be considerable.

Cultural Resources. The context for assessing cumulative impacts to regional archeological knowledge of our past is the geographical extent of regional historic and pre-historic knowledge. Loss of on-site archaeological resources could reduce or eliminate important information relevant to the City of Riverside and/or the Inland Empire. Mitigation Measures C-1 and C-2 have been incorporated requiring evaluation of any discovered potential archaeological resources, the uniqueness of the archaeological sample, and appropriate steps to preserve or curate the artifact. This will eliminate any potential loss of important local archaeological information that may be buried under the project site; therefore, the project will have no contribution to a cumulative loss of important regional archaeological knowledge.

Noise. The project is not a substantial source of operational noise, as discussed in Section 4.12.C, and therefore would not contribute considerably to noise levels in the immediate vicinity of the project. The project will contribute to temporary increases in noise levels in the immediate project vicinity during construction activities; however, Mitigation Measures N-1 and N-2 will be incorporated to minimize construction-related noise and therefore the project's contribution will not be considerable. The project will increase traffic in the project area; however, project traffic-related noise will not be discernible (as discussed in Section 4.12.C) to the public and therefore will have no considerable contribution to cumulative traffic-related noise.

Global Impacts

One topic of global concern is climate change. As discussed in Section 4.7, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. The project will not contribute considerably to global climate change with implementation of existing regulations.

Based on the above analysis concerning the local, regional, and global impacts of the project in consideration of past, current, and future projects, the City of Riverside hereby finds that the contribution of the proposed project to cumulative impacts will be less than significant with mitigation incorporation.

c) **Less than Significant with Mitigation Incorporation.** Based on the analysis of the project's impacts in the responses to items 4.1 thru 4.17, there is no indication that this project could result in substantial adverse effects on human beings. While there would be temporary adverse effects during construction related to noise, these will be reduced to less than significant levels through mitigation and incorporation of standard requirements for noise. Less than significant long-term effects would include biological resources, greenhouse gas emissions, hazards, hydrology, population and housing, public services, traffic, utilities and service systems, and changing the visual character of the site, with a majority of these impacts affecting the project site itself. The analysis herein concludes that direct and indirect environmental effects will at worst require mitigation to reduce impacts related to air quality, cultural resources, and noise to less than significant levels. Generally, environmental effects will result in less than significant impacts. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporation.

5 References

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5.2 – Persons and Organizations Consulted

None

6 Summary of Mitigation Measures

Air Quality

AQ-1 Prior to issuance of building permits, the project proponent shall submit, to the satisfaction of the Planning Department, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the CRP. The CRP measures shall be implemented to the satisfaction of City Building Director. These may include the following:

- That volatile organic compounds (VOC) of proposed architectural coatings not exceed 50 g/l for interior applications.
- That volatile organic compounds (VOC) of proposed architectural coatings not exceed 50 g/l for exterior applications.

This measure shall conform to the performance standard that emissions of volatile organic compounds from application of interior or exterior coatings shall not exceed the daily emissions thresholds established by the South Coast Air Quality Management District. The CRP shall specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings.

Cultural Resources

C-1 If potential archaeological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find and to retain a professional archaeologist to examine the materials to determine whether it is a *unique archaeological resource* as defined in Section 21083.2(g) of the State CEQA Statutes. If this determination is positive, the resource shall be left in place, if determined feasible by the project archaeologist. Otherwise, the scientifically consequential information shall be fully recovered by the archaeologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the City Community Development Director. A tribal monitor shall be retained to oversee earthmoving activities and assist in the identification of potential archaeological resources. The applicant shall bear the cost of implementing this mitigation.

C-2 If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Director of Community Development. The applicant shall bear the cost of implementing this mitigation.

Noise

N-1 Limit construction activities to the hours of 7:00 AM to 7:00 PM Monday through Friday and the hours of 8:00 AM to 5:00 PM on Saturdays. Construction activity shall be prohibited on Sundays and federal holidays. This mitigation measure must be implemented throughout construction and may be periodically monitored by the Planning Director or designee during routine inspections.

N-2 Prior to issuance of grading permits, the Applicant shall submit a mitigation plan prepared by a qualified engineer or other acoustical expert for review and approval by the Planning Division that identifies noise control measures that achieve a minimum 15 dBA reduction at the single family use to the north of the project site and a minimum 5 dBA reduction at the commercial use to the east and the business park to the south of the project site in construction-related noise levels. The mitigation plan may include use of vibratory pile drivers or other pile driving noise controls, sound curtains, engineered equipment controls, or other methods. Noise control requirements shall be noted on project construction drawings and verified by the Building Department during standard inspection procedures.

SYCAMORE 215 CROSS DOCK Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
Air Quality Mitigation Measure							
AQ-1	Prior to issuance of building permits, the project proponent shall submit, to the satisfaction of the Planning Department, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the CRP. The CRP measures shall be implemented to the satisfaction of City Building Director. These may include the following: • That volatile organic compounds (VOC) of proposed architectural coatings not exceed 50 g/l for interior applications. • That volatile organic compounds (VOC) of proposed architectural coatings not exceed 50 g/l for exterior applications. This measure shall conform to the performance standard that emissions of volatile organic compounds from application of interior or exterior coatings shall not exceed the daily emissions thresholds established by the South Coast Air Quality Management District. The CRP shall specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings.	Prior to issuance of building permits	Submit a Coating Restriction Plan	Building Department			
Cultural Resources Mitigation Measures							
C-1	If potential archaeological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find and to retain a professional archaeologist to examine the materials to determine whether it is a unique archaeological resource as defined in Section 21083.2(g) of the State CEQA Statutes. If this determination is positive, the resource shall be left in place, if determined feasible by the project archaeologist. Otherwise, the scientifically consequential information shall be fully recovered by the archaeologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the City Community Development Director. A tribal monitor shall be retained to oversee earthmoving activities and assist in the identification of potential archaeological resources. The applicant shall bear the cost of implementing this mitigation.	During Grading or Earth Moving Activities	Halt work and retain a professional archaeologist	Community Development Department			
C-2	If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has	During Grading or Earth Moving Activities	Halt work and retain a professional paleontologist	Community Development Department			

Mitigation Monitoring Reporting Program

SYCAMORE 215 CROSS DOCK Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	been completed and a report concerning it filed with the Director of Community Development. The applicant shall bear the cost of implementing this mitigation.						
Noise							
N-1	Limit construction activities to the hours of 7:00 AM to 7:00 PM Monday through Friday and the hours of 8:00 AM to 5:00 PM on Saturdays. Construction activity shall be prohibited on Sundays and federal holidays. This mitigation measure must be implemented throughout construction and may be periodically monitored by the Planning Director or designee during routine inspections.	Throughout Construction	Limit construction activity to indicated hours	Planning Director			
N-2	Prior to issuance of grading permits, the Applicant shall submit a mitigation plan prepared by a qualified engineer or other acoustical expert for review and approval by the Planning Division that identifies noise control measures that achieve a minimum 15 dBA reduction at the single family use to the north of the project site and a minimum 5 dBA reduction at the commercial use to the east and the business park to the south of the project site in construction-related noise levels. The mitigation plan may include use of vibratory pile drivers or other pile driving noise controls, sound curtains, engineered equipment controls, or other methods. Noise control requirements shall be noted on project construction drawings and verified by the Building Department during standard inspection procedures.	Prior to issuance of grading permits	Submit a mitigation plan	Building Department			

7 Appendix Materials